TSD File Inventory Index

Date: February 17, 2000

Initial: C M Stevenson

Facility Name: CITGO Petroleum Corporation (East Chicago Tank Farm)

Facility Identification Number: IND 005 267 381

A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	X
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folders per schedule.

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

JUN 13 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

B. L. Reeder, Terminal Manager
Cities Service Company
P.O. Box 178
East Chicago, Indiana 46312

RE: Interim Status Acknowledgement USEPA ID No. IND 095 267 381
FACILITY NAME: CITIES SERVICE COMPANY

Dear Mr. Reeder:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

GES 6/10/82

Enclosure

cc: R. Scott VanDyke

FACILITY NAME

CITIES SERVICE COMPANY

EPA ID NUMBER

IND095267381

FACILITY OPERATOR

CITIES SERVICE COMPANY

FACILITY OWNER

CITIES SERVICE COMPANY

FACILITY LOCATION

2500 EAST CHICAGO AVE
EAST CHICAGO IN 46312

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S02	149100.00000	G

OK 9425 6/10/82

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved. O.M.B. No. [illegible]
GSA No. 0245-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Mailing, Contact, Phone Changed 1-12-84 MGP

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: S F | I N D 0 9 5 2 6 7 3 8 1 | T/A | C 1

APPROVED:

DATE RECEIVED (yr., mo., & day):

I. NAME OF INSTALLATION

CITGO PETROLEUM CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 P.O. BOX 178

CITY OR TOWN: 4 EAST CHICAGO | ST.: IN | ZIP CODE: 46312

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 2500 EAST CHICAGO AVENUE

CITY OR TOWN: 6 EAST CHICAGO | ST.: IN | ZIP CODE: 46312

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 REEDER, B.L., TERMINAL MANAGER

PHONE NO. *(area code & no.)*: 219-398-7734

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CITGO PETROLEUM CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*: N/A

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

RECEIVED 11/26/87

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: I N D 0 9 5 2 6 7 3 6 1

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[ ] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	John S. Grabowski, Jr. Environmental & Safety Specialist	Nov. 18, 1983

EPA Form 8700-12 (6-80) REVERSE

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ IND095267381

CITGO PETROLEUM CORP
PO BOX 300 ATTN BEJI MALEK
TULSA OK 74102

INSTALLATION ADDRESS ➤

2500 EAST CHICAGO AVE
EAST CHICAGO IN 46312

EPA Form 8700-12B (4-80)

07/28/83

M 7/25/83

XA

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ IND095267381 REACKNOWLEDGEMENT

CITIES SERVICES COMPANY
PO BOX 300
TULSA OK 74102

INSTALLATION ADDRESS ➤

2500 EAST CHICAGO AVE
EAST CHICAGO IN 46312

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: S F I N D 0 9 5 2 6 7 3 8 1 | T/A: C 1 | APPROVED: | DATE RECEIVED (yr., mo., & day):

I. NAME OF INSTALLATION

Cities Service Company

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 P O Box 300

CITY OR TOWN: 4 Tulsa | ST.: OK | ZIP CODE: 74102

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 2500 East Chicago Ave

CITY OR TOWN: 6 East Chicago | ST.: IL ~~IN~~ | ZIP CODE: 46312

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 Reeder, B L, Terminal Manager | PHONE NO. *(area code & no.)*: 219-398-0734

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 Cities Service Company

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: F = FEDERAL, M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: I N D 0 9 5 2 6 7 3 8 1

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

NOV 19 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

S														T/A	C
W	I	N	D	0	9	5	2	6	7	3	8	1		3	1
1	2											13		14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John S. Grabowski, Jr.	John S. Grabowski, Jr. Environmental Control and Safety Coord	November 17, 1980

N/A

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

January 30, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RCRA Activities
U. S. Environmental Protection Agency,
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Re: Citgo Petroleum Corporation
East Chicago, Indiana
EPA I. D. No. IND 095267381

Gentlemen:

This letter is to acknowledge receipt on January 27, 1986 of correspondence from Mr. David A. Stringham, Chief, Solid Waste Branch, concerning the corrective action requirements of the Resource Conservation and Recovery Act ("RCRA") Hazardous and Solid Waste Amendments of 1984 as they relate to the Citgo Petroleum Corporation ("Citgo") bulk petroleum products terminal located at 2500 East Chicago Avenue, East Chicago, Indiana.

Mr. Stringham's correspondence suggests that Citgo is operating a hazardous waste management facility under the RCRA "interim status" provisions and, as such, is required to submit certain information concerning potential releases from solid waste management units. A similar request was made by Ms. E. M. Ardiente, Chief, Technical Programs Section, in a letter dated September 3, 1985. In response to that request, Citgo noted in a letter dated September 24, 1985, that the Company was not seeking a permit to operate a hazardous waste facility at this terminal. A copy of that response is enclosed for your review.

As indicated in the September 24th letter, it appears that EPA's request to Citgo to complete a Certification Regarding Potential Releases from Solid Waste Management Units is not appropriate as closure was sought by Cities Service Company, the former operator of the terminal, prior to the November 8, 1984 enactment of the Hazardous and Solid Waste Amendments of 1984, and, as stated previously, Citgo is not seeking a permit to

treat, store, or dispose of hazardous waste at this site under Section 3005 of RCRA. Further, since submittal of the September 24th letter, it is Citgo's understanding that the state of Indiana has terminated the interim status requested by the former owner and operator for this operation. For these reasons, Citgo is, again, returning this form to EPA unsigned.

Should you require any additional information concerning this matter, please contact me at 918/495-4764 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Manager

cc: Ancal Neal
Jim Miller
Kirk Sniff, Dallas
Ken Robb, East Chicago

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

September 24, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Edith M. Ardiente, P. E.
Chief, Technical Programs Section
U. S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Citgo Petroleum Corporation
East Chicago, Indiana
EPA I. D. No. IND 095267381

Dear Ms. Ardiente:

This letter is to acknowledge receipt on September 6, 1985, of your correspondence dated September 3, 1985, concerning the corrective action requirements of the Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendments of 1984 as they relate to the Citgo Petroleum Corporation ("Citgo") bulk petroleum products terminal located at 2500 East Chicago Avenue, East Chicago, Indiana.

As you may be aware, this terminal was owned and operated by Cities Service Company ("Cities"). In November, 1980, Cities determined that it would not be reasonably feasible to remove certain waste material scheduled for disposal within the allotted 90 days (see 40 CFR 262.34). Accordingly, to avoid non-compliance, on November 18, 1980, Cities submitted an application to the U. S. Environmental Protection Agency ("EPA") to operate a hazardous waste storage facility. In a letter dated June 24, 1982, addressed to EPA, Cities requested closure of this storage facility. In this letter, Cities noted that the operation would remain a generator of hazardous waste. Further, in a letter dated March 18, 1983, forwarding a copy of the 1982 annual report to the Indiana State Board of Health ("ISBH"), Cities again noted that a request for closure was submitted to EPA, Region V.

On May 16, 1983, Citgo and Cities submitted correspondence jointly addressed to EPA and ISBH requesting the referenced hazardous waste generator identification number be transferred from Cities to Citgo effective May 30, 1983. Pursuant to a verbal request from EPA on November 17, 1983, Citgo submitted a Notification of Hazardous Waste Activity form to reflect that Citgo is only a generator of hazardous waste at the East Chicago terminal.

On April 8, 1985, Citgo and Cities met with representatives of Ecology and Environment and ISBH to review hazardous waste activities at the East Chicago site. As you are aware, Ecology and Environment is a consultant to

EPA. Both parties, I understand, were satisfied at the conclusion of the meeting that the terminal was not involved in any on-site hazardous waste treatment, storage or disposal activities.

In a Notice of Violation dated June 11, 1985, ISBH requested additional information concerning closure of this hazardous waste storage facility. This information was provided to ISBH in a letter from Cities dated July 17, 1985. A copy of this record review summary prepared by Cities is enclosed for your records.

In light of this information, it appears EPA's request to Citgo to complete a Certification Regarding Potential Releases from Solid Waste Management Units is not appropriate as closure was sought by Cities, the former operator of the terminal, prior to the November 8, 1984 enactment of the Hazardous and Solid Waste Amendments of 1984 and, as stated previously, Citgo is not seeking a permit to treat, store, or dispose of hazardous waste at this site under Section 3005 of RCRA. Therefore, Citgo is returning this form to you uncompleted. Further, as closure was thought to be completed by Cities prior to Citgo's involvement with the terminal, please direct any further questions to that firm.

Should you have any questions concerning this matter, please contact me at 918/495-4764 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Manager

JSGJr:rsk
Enclosure
cc: Ancal Neal
Jim Miller
Kirk Sniff, Dallas
Ken Robb, East Chicago
Beji Malek, CSOGC

Part A

5HS-12

CERTIFIED MAIL°
RETURN RECEIPT REQUESTED

John Grabowski
Environmental Control
Safety Coordinator
Citgo Petroleum Corporation
Post Office Box 300
Tulsa, Oklahoma 74102

RE: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
IND 095267381

Dear Mr. Grabowski:

As you are aware, Indiana State Board of Health (ISBH) is currently evaluating your request for closure of the above referenced facility which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any tentative decision we

make regarding releases of hazardous waste or hazardous constituents to the environment will be included in a public notice inviting public comment on our tentative decision. Public notice will be in a newspaper of general circulation in the area of the facility. Please submit copies of your response to:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690

David Lamm, Director
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206-1964

Please call the previously identified contact for this permit application if you have any questions, or wish to discuss this matter further.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures

cc: Guinn Doyle, ISBH

bcc: Martin Hamper
Hak Cho
Part A file

5HS/Cho:vc 8/29/85 Disk #14

MK 8/30/85

	TYP	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	[illegible]	OH CHIEF	WPS CHIEF	WIMD CHIEF	WIMD DIR
INIT. DATE	VC 8/29	HAC 8/29/85		HAC 8/29/85						

8/30/85

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

September 24, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Edith M. Ardiente, P. E.
Chief, Technical Programs Section
U. S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Citgo Petroleum Corporation
East Chicago, Indiana
EPA I. D. No. IND 095267381 G,TSD,PA, 8

Dear Ms. Ardiente:

This letter is to acknowledge receipt on September 6, 1985, of your correspondence dated September 3, 1985, concerning the corrective action requirements of the Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendments of 1984 as they relate to the Citgo Petroleum Corporation ("Citgo") bulk petroleum products terminal located at 2500 East Chicago Avenue, East Chicago, Indiana.

As you may be aware, this terminal was owned and operated by Cities Service Company ("Cities"). In November, 1980, Cities determined that it would not be reasonably feasible to remove certain waste material scheduled for disposal within the allotted 90 days (see 40 CFR 262.34). Accordingly, to avoid non-compliance, on November 18, 1980, Cities submitted an application to the U. S. Environmental Protection Agency ("EPA") to operate a hazardous waste storage facility. In a letter dated June 24, 1982, addressed to EPA, Cities requested closure of this storage facility. In this letter, Cities noted that the operation would remain a generator of hazardous waste. Further, in a letter dated March 18, 1983, forwarding a copy of the 1982 annual report to the Indiana State Board of Health ("ISBH"), Cities again noted that a request for closure was submitted to EPA, Region V.

On May 16, 1983, Citgo and Cities submitted correspondence jointly addressed to EPA and ISBH requesting the referenced hazardous waste generator identification number be transferred from Cities to Citgo effective May 30, 1983. Pursuant to a verbal request from EPA on November 17, 1983, Citgo submitted a Notification of Hazardous Waste Activity form to reflect that Citgo is only a generator of hazardous waste at the East Chicago terminal.

On April 8, 1985, Citgo and Cities met with representatives of Ecology and Environment and ISBH to review hazardous waste activities at the East Chicago site. As you are aware, Ecology and Environment is a consultant to

EPA. Both parties, I understand, were satisfied at the conclusion of the meeting that the terminal was not involved in any on-site hazardous waste treament, storage or disposal activities.

In a Notice of Violation dated June 11, 1985, ISBH requested additional information concerning closure of this hazardous waste storage facility. This information was provided to ISBH in a letter from Cities dated July 17, 1985. A copy of this record review summary prepared by Cities is enclosed for your records.

In light of this information, it appears EPA's request to Citgo to complete a Certification Regarding Potential Releases from Solid Waste Management Units is not appropriate as closure was sought by Cities, the former operator of the terminal, prior to the November 8, 1984 enactment of the Hazardous and Solid Waste Amendments of 1984 and, as stated previously, Citgo is not seeking a permit to treat, store, or dispose of hazardous waste at this site under Section 3005 of RCRA. Therefore, Citgo is returning this form to you uncompleted. Further, as closure was thought to be completed by Cities prior to Citgo's involvement with the terminal, please direct any further questions to that firm.

Should you have any questions concerning this matter, please contact me at 918/495-4764 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Manager

JSGJr:rsk
Enclosure
cc: Ancal Neal
Jim Miller
Kirk Sniff, Dallas
Ken Robb, East Chicago
Beji Malek, CSOGC

CITGO Petroleum Corporation

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

November 17, 1983

Ms. M. Pickett
RCRA Activities
U. S. Environmental Protection Agency
Region V
P. O. Box A-3587
Chicago, IL 60604

Re: Hazardous Waste
Re-Notification Forms

Dear Ms. Pickett:

This letter is in reference to our telephone conversation of today's date concerning the enclosed federal re-notification forms for hazardous waste activity prepared for Company bulk petroleum product terminals operating in areas under the jurisdiction of U.S. EPA, Region V.

These forms are completed for CITGO Petroleum Corporation operations located at the following addresses:

1391 Bylsby Avenue
Green Bay, WI 54303
Attn: Mr. T. E. Lewandowski

4606 Terminal Drive
McFarland, WI 53558
Attn: Mr. J. W. Braier

2316 Terminal Drive
Arlington Heights, IL 60605
Attn: Mr. M. J. Kerkstra

5105 South Harlem Avenue
Forest View, IL 60502
Attn: Mr. E. R. Collins

Mounted Rt. & North Lakeshore Drive
Gladstone, MI 49837
Attn: Mr. E. R. Elliott

524 Third Street
Ferrysburg, MI 49409
Attn: Mr. R. D. Bonney

2001 Morrill Road
Jackson, MI 49201
Attn: Mr. L. E. Ahrens

2233 South Third Street
Niles, MI 49120
Attn: D. E. Schoenleber

2500 East Chicago Avenue
East Chicago, IN 46312
Attn: Mr. B. L. Reeder

1820 Front Street
Toledo, OH 46304
Attn: Mr. R. R. Neill

As we agreed, it is not necessary to complete another re-notification for the Company's facility located in Huntington, Indiana, as this form was submitted to your agency on November 2, 1983.

Should you require any further information concerning this matter, please feel free to contact me in Lake Charles, Louisiana at 318/491-6340 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental & Safety Specialist

JSG/bm

Enclosure

xc: Messrs. C. A. Vincent, Jr.
R. V. Faith - Tulsa
W. B. Meyberg - Tulsa
T. E. Lewandowski - Green Bay
J. W. Braier - Madison
M. J. Kerkstra - Mt. Prospect
E. R. Collins - Waterway
E. R. Elliott - Kipling
R. D. Bonney - Ferrysburg
L. E. Ahrens - Jackson
D. E. Schoenleber - Niles
B. L. Reeder - East Chicago
R. R. Neill - Toledo
M. A. Hovis - Huntington

RESPONDENT CONTACT RECORD (RCR)

Facility ID Number

Company Name: Citgo Petroleum Corp.

Company Address

City

State

Zip Code

Contact Person's Name/Title: John Grabowski Envir Saf Spec

Telephone Number (including area code): 8 [3][1][8]-[4][7][7]-[6][3][4][6]

CONTACT RECORD

Date	Contractor's Name	Items discussed/resolution
11-17-83	MCP	Grabowski requested that facility location be used for mailing address + terminal mgr to be contact for all Dend subsequent 8700-12's for all installations involved.

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

These changes made as of 7/~~24~~/83
TSD deleted 7/28/83 MW — 7/28/83 MW

PLEASE PLACE LABEL IN THIS SPACE

I. INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F IWD095267381 T/A C 1		

I. NAME OF INSTALLATION

CITGO PETROLEUM CORP

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 300 ATTN BEJI MALEK

CITY OR TOWN: 4 TULSA — ST.: OK — ZIP CODE: 74102

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 GRABOWSKI JOHN ENVIR MGR

PHONE NO. *(area code & no.)*: 918-561-4076

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CITGO PETROLEUM CO

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: 56

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- 57 ☐ A. GENERATION
- 58 ☐ B. TRANSPORTATION *(complete item VII)*
- 59 ☐ C. TREAT/STORE/DISPOSE
- 60 ☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- 61 ☐ A. AIR
- 62 ☐ B. RAIL
- 63 ☐ C. HIGHWAY
- 64 ☐ D. WATER
- 65 ☐ E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- ☐ A. FIRST NOTIFICATION
- ☐ B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S W | 1 2 ... 13 | T/A 14 | C 15 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED

DETACH

DETACH

RESPONDENT CONTACT RECORD (RCR)

Facility ID Number

Company Name: CITGO PETROLEUM CORP

Company Address

City: TULSA

State: OK

Zip Code

Contact Person's Name/Title: BEJI MALEK

Telephone Number (including area code): 918-561-3931
8-736-4011

CONTACT RECORD

Date	Contractor's Name	Items discussed/resolution
7/14/83	M&P	Malek said that Citgo's legal department needed written acknowledgement of ownership change by Aug. 1, 1983. She said Grabowski was scheduled for transfer Aug 1, 1983 as well. She requested that re acknowledgements be sent to PO Box 300, Attn: Beji Malek, Tulsa OK 74102. She would send copies to Grabowski + remind him to send us a letter giving new address.

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	IND095267381
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
III. LOCATION OF INSTALLATION	001986 AUG 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F IND095267381 T/A 2 C 1	A	80 08 18

I. NAME OF INSTALLATION

CITIES SERVICE COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 178

CITY OR TOWN	ST.	ZIP CODE
4 EAST CHICAGO	IN	46312

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 2500 EAST CHICAGO AVE

CITY OR TOWN	ST.	ZIP CODE
6 EAST CHICAGO	IN	46312

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 BL REEDER TERMINAL MANAGER	219-398-0734

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CITIES SERVICE COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)
F = FEDERAL
M = NON-FEDERAL
M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: IND095267387

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 25 1980

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	I	N	D	0	9	5	2	6	7	3	8	1	2	1
1	2										13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
[signature]	TERMINAL FACILITIES MANAGER	8-14-80

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

May 16, 1983

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

U. S. Environmental Protection Agency
ATTN: Regional Director
Region V
230 South Dearborn
Chicago, Illinois 60604

Hazardous Waste Branch
ATTN: Mr. G. Doyle, Chief
Division of Land Pollution Control
Indiana State Board of Health
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Permit Transfer Request
2500 East Chicago Avenue
East Chicago, Indiana 46312 IND095267381

G, T, O, PA
Non Reg' file

Gentlemen:

Cities Service Company desires to assign and transfer certain of its assets to its wholly-owned subsidiary, CITGO Petroleum Corporation. Cities Service Company is the current operator and permittee under the following-referenced permit and requests that the permit be transferred to CITGO Petroleum Corporation to show it as the operator and permittee.

The physical operations of the facility will continue to be operated by the same personnel subsequent to the transfer as before the transfer. However, the new mailing address for CITGO Petroleum Corporation is Post Office Box 3758, Tulsa, Oklahoma 74102.

Cities Service Company will remain responsible for all permit obligations, coverage and liability in connection with the following-referenced permit and facility occurring before receipt of the necessary regulatory agency's approval with respect to the transfer of such permit and operations.

May 30, 1983, is the specific date for transfer of permit responsibility, coverage and liability between Cities Service Company and CITGO Petroleum Corporation. On said date CITGO Petroleum Corporation will assume all permit responsibility, coverage and liability in connection with the following referenced permit.

The above is applicable to the hazardous waste generator identification No. IND095267361 issued to the referenced facility.

Should you require any additional information or wish to discuss this matter further, please do not hesitate to contact John S. Grabowski, Jr., at 918/561-4076. Thank you for your prompt consideration of this matter.

Sincerely,

Herman A. Fritschen, General Manager
Safety & Environmental Services
CITIES SERVICE COMPANY

John S. Grabowski, Jr.
Environmental and Safety Manager
CITGO PETROLEUM CORPORATION

HAF/JSGJr./bh

Miner

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

June 24, 1982

RECEIVED
JUN 28 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

~~NO ACTION TAKEN~~
~~PENDING DECISION ON TERMINAL~~
~~BY EPA STAFF~~
~~DATE~~

copy to notify (Gus)
copy to SLO
orig to PA (Becky)

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Waste Management Branch
U. S. Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

ATTN: Mr. Karl J. Klepitsch, Jr.
Chief

Re: RCRA Activities - Hazardous
Waste Storage Permit Application
East Chicago, Indiana

IND095267381
9 BD PA

Dear Mr. Klepitsch:

This letter is in reference to your correspondence dated June 13, 1982, to Mr. B. L. Reeder concerning the above-referenced permit application.

As you are aware, on November 18, 1980, Cities Service Company, pursuant to the U. S. EPA Hazardous Waste Management System Regulations, submitted this application to store a maximum of 149,100 gallons of oil-saturated waste material at the Company's petroleum product terminal located in East Chicago, Indiana.

It has since been determined that this hazardous waste storage facility is no longer required by the Company. Material remaining in storage was manifested and transported offsite to a permitted treatment facility, in accordance with all applicable hazardous waste regulations. Normal petroleum storage tank cleaning operations were conducted in January, 1982, to remove remaining waste residue. Also, as required, the tank was inspected by an independent registered professional engineer. A copy of the inspection letter is enclosed. Subsequent to the inspection, the storage tank was dismantled.

Therefore, Cities Service Company respectfully requests approval from the U. S. Environmental Protection Agency to close the above-referenced hazardous waste storage area. It should be noted, though, that the referenced terminal will remain a generator of hazardous waste

RECEIVED
6-29-82

in accordance with the hazardous waste activity notification originally submitted.

Should you have any questions concerning this request, please do not hesitate to contact me at 918/561-4076 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Control and
Safety Coordinator

JSGJr:bh
Enclosure

(918) 495-4000

Miner

haas & associates
CONSULTING ENGINEERS

January 22, 1982

Cities Service Company
2500 E. Chicago Avenue
East Chicago, IN 46312

Attn: Mr. Bob Reeder

Re: Storage Tank #195 Inspection

Gentlemen:

In accordance with your request, we inspected the 15 ft. diameter by 15 ft. high steel tank which had formerly been lead lined. We found the tank to be empty and dry at the time of inspection. Enclosed is our application for payment.

Please contact this office if you have any questions regarding our inspection.

Very truly yours,

Patrick C Haas

Patrick C. Haas, P.E.
Indiana P.E. License No. 7585

PATRICK C. HAAS
REGISTERED
No.
7585
STATE OF
INDIANA
PROFESSIONAL ENGINEER

dn
Enclosure

705 Franklin Sq.
Michigan City, IN 46360
219/872-9406

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F IND095267381 3

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

III. FACILITY MAILING ADDRESS

IV. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affi it in the designated space. Review the inform ation carefully; if any of it is incorrect, cro through it and enter the correct data in th appropriate fill-in area below. Also, if any the preprinted data is absent *(the area to th left of the label space lists the information that should appear)*, please provide it in th proper fill-in area(s) below. If the label i complete and correct, you need not complet Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete a items if no label has been provided. Refer t the instructions for detailed item descrip tions and for the legal authorizations unde which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: Cities Service Company

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 Reeder, B. L., Terminal Manager	219 398 0734

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 P O Box 178

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 East Chicago	IN	46312

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 2500 East Chicago Ave

B. COUNTY NAME: Lake

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 East Chicago	IN	46312	089

CONTINUE ON REVERSE

CONTINUE FROM FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
(specify) 5171 Petroleum Bulk Stations and Terminals	(specify) 5172 Petroleum and Petroleum Products Wholesale
C. THIRD	**D. FOURTH**
(specify)	(specify)

406

VIII. OPERATOR INFORMATION

A. NAME

Cities Service Company

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)

P (specify)

D. PHONE (area code & no.)

E. STREET OR P.O. BOX

P O Box 300

F. CITY OR TOWN

Tulsa

G. STATE OK

H. ZIP CODE 74102

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N IN0000159

D. PSD (Air Emissions from Proposed Sources): 9 P

B. UIC (Underground Injection of Fluids): 9 U

E. OTHER (specify): 9 (specify)

C. RCRA (Hazardous Wastes): 9 R

E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9A/51

XII. NATURE OF BUSINESS (provide a brief description)

Bulk liquid hydrocarbon storage and loading terminal.

F9A/51

XIII. CERTIFICATION (see Instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
R. Scott VanDyke, Vice President Transportation	R. Scott VanDyke	November 18, 1980

COMMENTS FOR OFFICIAL USE ONLY

C

Form Approved OMB No. [illegible]

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: I N D 0 9 5 2 6 7 3 8 1 3

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[ ] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 | YR. 7 2 | MO. 1 2 | DAY 3 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
> SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A 3 1 C

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 2	149,100 000	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES *(code)*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

406

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W I N D 0 9 5 2 6 7 3 8 1 3

FOR OFFICIAL USE ONLY: W DUP T/A 3 C 2 DUP

4106

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 1	633,68 0	T	S 0 2	Total Waste Contained
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

PTION OF HAZARDOUS WASTES (continued)

E SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

4/06

EPA I.D. NO. (enter from page 1)

													T/A	C
I	U	D	0	9	5	2	6	7	3	8	1		3	6
1	2											13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6 6/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6 6/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)								
4	1	3	8		3	3	0	8	7	2	8	0	1	9
65	66	67	68	69	-	71	72	-	74	75	76	77	-	79

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
18 - 55	56 - 58 / 59 - 61 / 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
16 - 40	C G 15 16 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
R. Scott VanDyke-Vice President Transportation	R. Scott VanDyke	November 18, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
R. Scott VanDyke-Vice President Transportation	R. Scott VanDyke	November 18, 1980

Miner

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

June 24, 1982

RECEIVED
JUN 28 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF
DATE 6-29-82

Copy to notify (gus)
copy to SIO
orig to PA (Becky)

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Waste Management Branch
U. S. Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

ATTN: Mr. Karl J. Klepitsch, Jr.
Chief

Re: RCRA Activities - Hazardous
Waste Storage Permit Application
East Chicago, Indiana

IND 095267381
9 BD PA

Dear Mr. Klepitsch:

This letter is in reference to your correspondance dated June 13, 1982, to Mr. B. L. Reeder concerning the above-referenced permit application.

As you are aware, on November 18, 1980, Cities Service Company, pursuant to the U. S. EPA Hazardous Waste Management System Regulations, submitted this application to store a maximum of 149,100 gallons of oil-saturated waste material at the Company's petroleum product terminal located in East Chicago, Indiana.

It has since been determined that this hazardous waste storage facility is no longer required by the Company. Material remaining in storage was manifested and transported offsite to a permitted treatment facility, in accordance with all applicable hazardous waste regulations. Normal petroleum storage tank cleaning operations were conducted in January, 1982, to remove remaining waste residue. Also, as required, the tank was inspected by an independent registered professional engineer. A copy of the inspection letter is enclosed. Subsequent to the inspection, the storage tank was dismantled.

Therefore, Cities Service Company respectfully requests approval from the U. S. Environmental Protection Agency to close the above-referenced hazardous waste storage area. It should be noted, though, that the referenced terminal will remain a generator of hazardous waste

RECEIVED
6-29-82

in accordance with the hazardous waste activity notification originally submitted.

Should you have any questions concerning this request, please do not hesitate to contact me at 918/561-4076 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Control and
Safety Coordinator

JSGJr:bh
Enclosure

Haas & Associates
CONSULTING ENGINEERS

January 22, 1982

Cities Service Company
2500 E. Chicago Avenue
East Chicago, IN 46312

Attn: Mr. Bob Reeder

Re: Storage Tank #195 Inspection

Gentlemen:

In accordance with your request, we inspected the 15 ft. diameter by 15 ft. high steel tank which had formerly been lead lined. We found the tank to be empty and dry at the time of inspection. Enclosed is our application for payment.

Please contact this office if you have any questions regarding our inspection.

Very truly yours,

Patrick C. Haas

Patrick C. Haas, P.E.
Indiana P.E. License No. 7585

PATRICK C. HAAS
REGISTERED
No.
7585
STATE OF
INDIANA
PROFESSIONAL ENGINEER

dn
Enclosure

705 Franklin Sq.
Michigan City, IN 46360
219/872-9406

406

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

November 19, 1980

U. S. Environmental Protection
Agency, Region V
230 S. Dearborn St.
Chicago, IL 60604

Re: Hazardous Waste Storage
Permit Application,
East Chicago, Indiana

Gentlemen:

Enclosed are the Hazardous Waste Permit Application and the Notification of Hazardous Waste Activity, subsequent notification forms for the Cities Service Company bulk petroleum storage and loading terminal located in East Chicago, Indiana.

The Hazardous Waste Permit Application is submitted in compliance with Subtitle C of the Solid Waste Disposal Act as amended by the 1976 Resource Conservation and Recovery Act, Hazardous Waste Management System. Cities Service Company is currently storing approximately 149,000 gallons of oil and water emulsion waste.

The Notification of Hazardous Waste Activity form amends the original notification to indicate that the terminal does store waste material. At the time the original notification was submitted, Cities Service Company had felt that the storage area would be closed prior to the effective date of the regulations. Cities Service now finds that it is necessary to retain this storage area until an alternate storage or disposal site becomes available.

It is our understanding that by submitting the enclosed documents, Cities Service Company will be granted interim status as a storage facility at the East Chicago Terminal.

406

Should you have any questions, please contact me at 918/561-4076 at your convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental Control and
Safety Coordinator

JSG/dlc
Enclosures (3)

Enclosures:

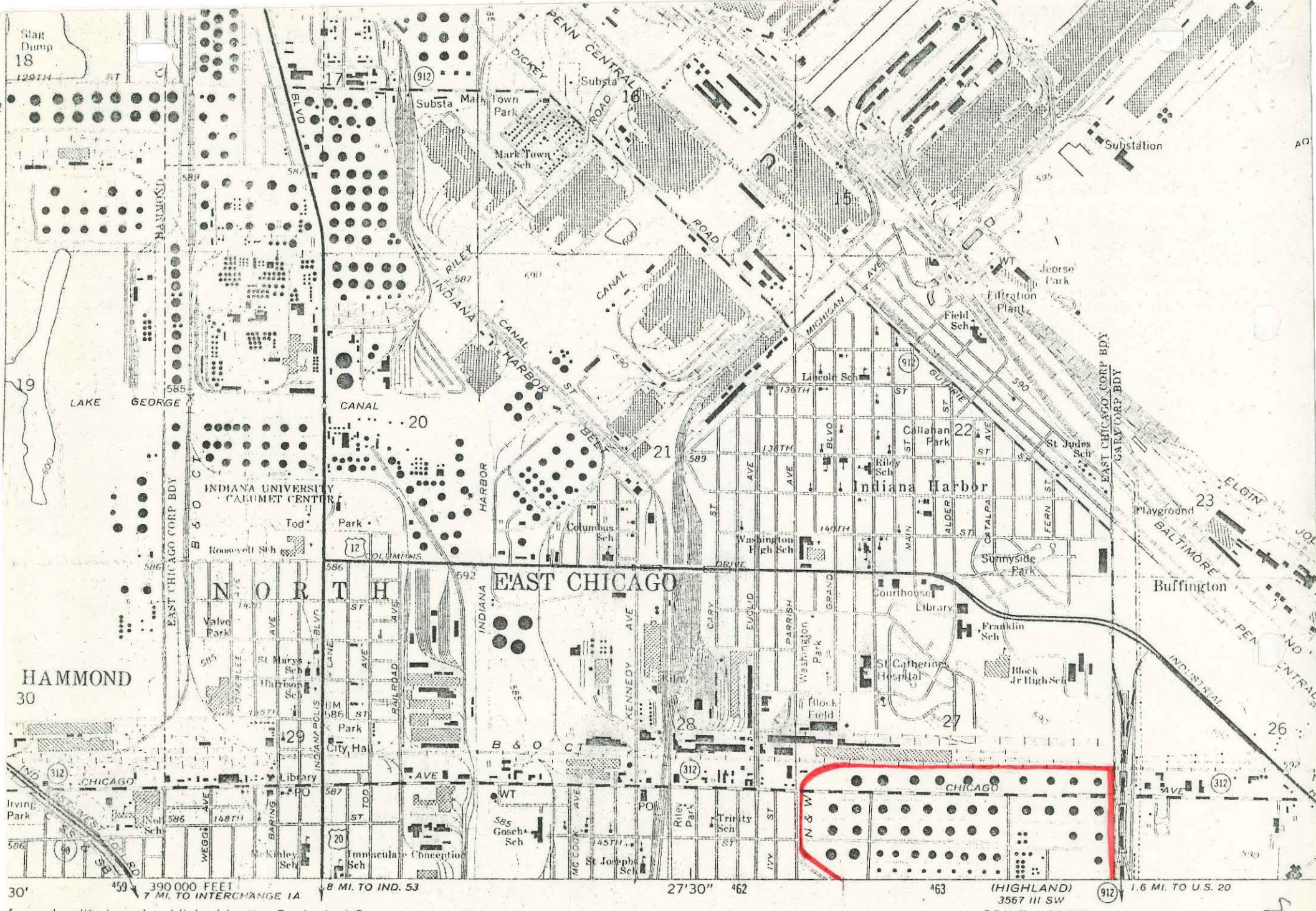
U. S. Environmental Protection Agency, Notification of Hazardous Waste Activity Form, EPA Form 8700-12(6-80)

U. S. Environmental Protection Agency, General Information Form, EPA Form 3510-1(6-80)

U. S. Environmental Protection Agency, Hazardous Waste Permit Application Form, EPA Form 3510-3(6-80)

Area Topographical Map

Attached is a topographical map of the area surrounding the Cities Service bulk petroleum storage and loading terminal in East Chicago, Indiana. The map is provided in compliance with Section XI of the U.S. Environmental Protection Agency's General Information Form 1.



Mapped, edited, and published by the Geological Survey

Control by USGS, USC&GS, USCE, and Indiana Flood Control and Water Resources Commission

Planimetry by photogrammetric methods from aerial photographs taken 1951. Topography by plane table surveys 1953. Revised from aerial photographs taken 1967. Field checked 1968

SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 0 1 KILOMETER

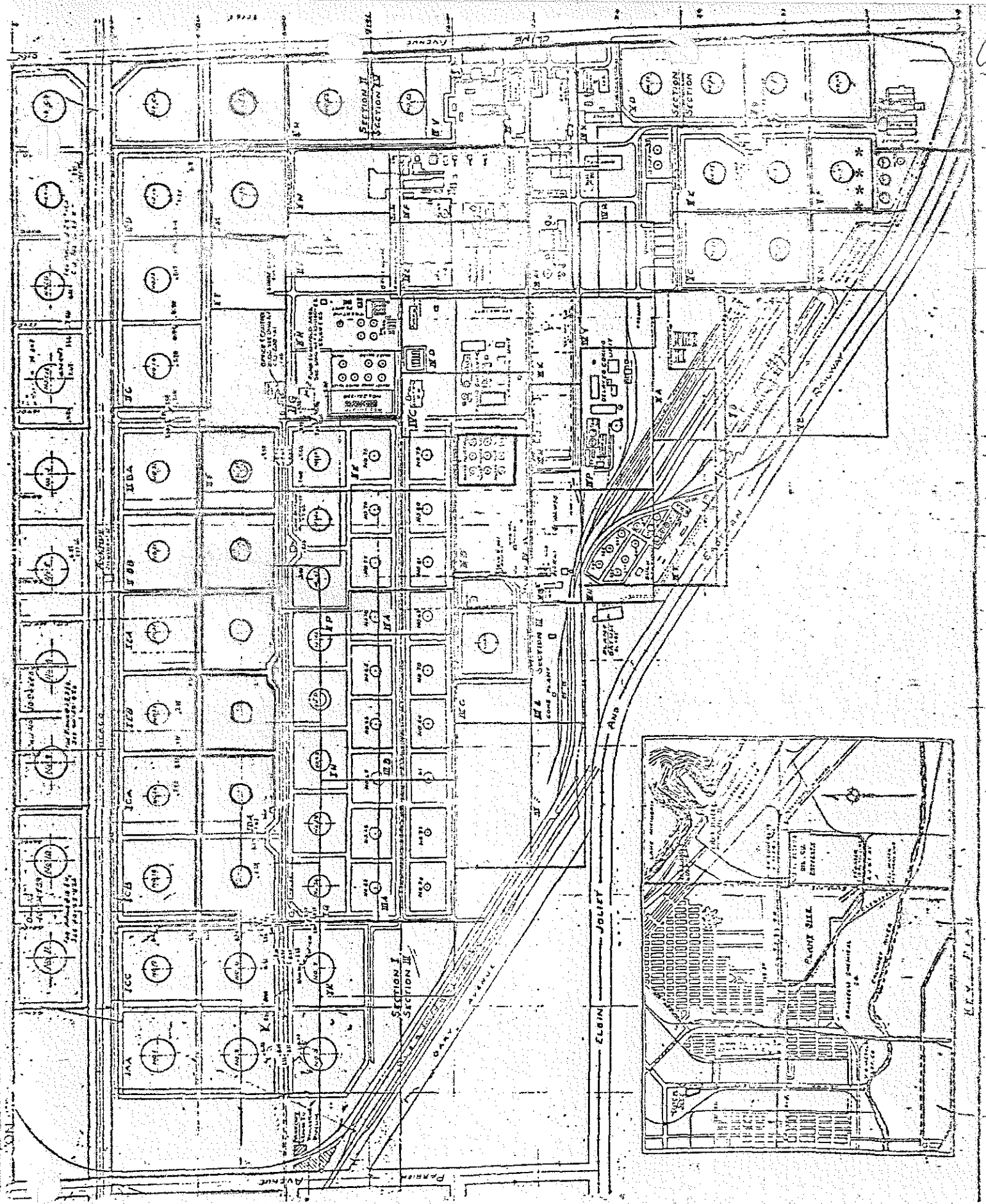
MN GN

c10b

Facility Drawing

Attached is a drawing of the Cities Service bulk petroleum storage and loading terminal located in East Chicago, Indiana.

The drawing is provided in compliance with Section V of the U. S. Environmental Protection Agency's Hazardous Waste Permit Application, Consolidated Permits Program Form 3.



Cities Service Company
Bulk Petroleum Storage and Loading Terminal
East Chicago, Indiana

* Waste Storage Tanks

Facility Photographs

Attached are photographs of the Cities Service bulk petroleum storage and loading terminal located in East Chicago, Indiana, indicating the hazardous waste storage area. The photographs are provided in compliance with Section VI of the U. S. Environmental Protection Agency Hazardous Waste Permit Application, Consolidated Permit Program Form 3.

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

March 26, 1985

Mr. Karl J. Klepitsch, Jr., Chief
Solid Waste Branch
U.S. Environmental Protection Agency
Region V
RCRA Activities
P. O. Box A-3587
Chicago, Illinois 60690

Re: U.S. EPA Hazardous Waste
Generator
ID No. IND095267361 G,TSD PA-8

Dear Mr. Klepitsch:

This letter is to acknowledge receipt of your correspondence dated March 12, 1985 and addressed to owners and operators of hazardous waste treatment, storage or disposal (TSD) facilities.

A copy of this correspondence was sent to Citgo Petroleum Corporation's bulk petroleum product terminal located at 2500 East Chicago Avenue, East Chicago, Indiana. Please be aware that this operation is not a TSD facility.

Should you have any questions concerning this matter, please contact me at 918/495-4764.

Sincerely,

John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

cc: Jim Miller
Ancal Neal
Bob Reeder

A.4 Closure/ Post-Closure

Sharon K.
2) file IND 095 267 381

3

STATE OF INDIANA

INDIANAPOLIS 46206–1964

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
P. O. Box 1964

March 5, 1986

RECEIVED
MAR 31 1986
SWD - MS
U.S. EPA, REGION V

RECEIVED
3/7/86

VIA CERTIFIED MAIL

Ms. Beji Milek
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

Dear Ms. Milek:

Re: Cities Service Company/
Citgo Petroleum Corporation
East Chicago, Indiana
IND 095267381

Pursuant to 40 CFR 265.112 and 320 IAC 4.1-21-3(d), the Technical Secretary of the Indiana Environmental Management Board has approved the closure plan submitted by Cities Services Company/Citgo Petroleum Corporation on June 17, 1985.

The facility originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activity: S02 (tank storage). The approved plan calls for the elimination (closure) of tank storage.

The plan was reviewed by staff of the Division of Land Pollution Control, Indiana State Board of Health. The public comment period began on September 25, 1985, and ended on October 25, 1985. No comments were received.

Closure activities must be completed in accordance with the approved plan within one hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Technical Secretary certification per 40 CFR 270.11(d) and 320 IAC 4.1-21-6 both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved plan. The response

must indicate the desired future status of the facility (treatment/storage/disposal facility, generator, small quantity generator, or non-handler). Mail your response and certification to:

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (EPA) has the authority to implement this provision, therefore, a facility may still be subject to HSWA requirements.

Please direct all questions regarding the closure process to Mr. Garry Mills, Division of Land Pollution Control, AC 317/243-5145.

Very truly yours,

Ralph C. Pickard
Technical Secretary

GLM/kp
cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Pat Vogtman, U.S. EPA, Region V
East Chicago City Health Department

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

October 22, 1985

VIA CERTIFIED MAIL

Ms. Beji Milek
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

Dear Ms. Milek:

Re: Closure Plan
Cities Service Company
Citgo Petroleum Corporation
East Chicago, Indiana
IND 095267381

This will acknowledge the receipt of a closure plan from your Company on July 18, 1985. Staff has reviewed the information submitted and determined that it is inadequate to meet the requirements of Resource Conservation and Recovery Act (RCRA) closure. The plan must be revised and submitted to this office within thirty (30) days of receipt of this letter. The plan must address the following concerns:

1. The closure plan must include general facility information and a description of the manufacturing processes that generated the waste oil and sulfuric acid (40 CFR 265, Subpart G, and 320 IAC 4.1-21).

2. How the facility closure met the closure performance standard (40 CFR 265.111 and 320 IAC 4.1-21-2).

3. Describe the maximum extent of operation remaining unclosed following closure, including the maximum inventory of wastes (40 CFR 265.112 and 320 IAC 4.1-21-3). (If you did not transport, generate, treat, store, or dispose of any hazardous waste at this site following closure, you should state this. If you still conducted other hazardous waste activities at this site following closure, you should describe these activities in detail.)

4. The "Attachment V Closure Plan" document should be amended to include the dates of waste removal and disposal, and of tank cleaning, dismantling, and removal. These dates are mentioned in the cover letter dated July 17, 1985, and in other supporting documentation submitted with Attachment V.

If you have any questions concerning this matter, please contact Mr. Robert Malone of this office at AC 317/243-5052.

Very truly yours,

Thomas Russell

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Division of Land Pollution Control

RDM/tr
cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Ken Burch, U.S. EPA, Region V
Ms. Sally K. Swanson, U.S. EPA, Region V
Lake County Health Department

CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300 TULSA, OKLAHOMA 74102

July 17, 1985

Mr. David D. Lamm, Director
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

Re: RCRA Closure Record Review
Cities Service Company
CITGO Petroleum Corporation
IND 095267381
Notice of Violation (V-114)

Dear Mr. Lamm:

This is in response to the above referenced Notice of Violation dated June 11, 1985. Pursuant to telephone conversation with Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, the response deadline was extended to July 19, 1985.

In 1980 when RCRA regulations became effective, as a result of past operations approximately 15,000 gallons of oily waste material being scheduled for disposal was stored in a 15 feet diameter x 15 feet high steel tank (Tank No. 195) at Cities Service Company Petroleum product terminal located in East Chicago, Indiana. It was Cities Service Company's (Company) belief that necessary arrangements and paperwork for the proper disposal of this waste material would extend beyond 90 days and therefore provisions of 40CFR 262.34(b) applicable to generators might be violated. To avoid such non-compliance, on November 18, 1980 Cities Service applied for a storage permit in lieu of requesting EPA for a time extension to dispose of the waste material. Further, the Company believed that full compliance with RCRA was being achieved by following the applicable sections in parts 262, 263 and 265 subpart (J)-tanks.

Our plan to dispose of the waste material was to secure an approved waste disposal contractor to remove the waste from the tank, place it in drums, clean the tank, haul and dispose of waste material at an approved disposal site and then remove the cleaned tank from the facility. On November 13, 1981 Chemical Waste Management Inc. (CWM) (4300 West 123rd Street, Alsip, Illinois 60658) was contracted by Cities Service to perform this work. Enclosed are CWM's proposal to perform the work and Cities Service Agreement with contractor (Attachment I). The waste removal, disposal and tank cleaning was completed in January 1982 (Attachment II CWM letter dated January 12, 1982). As required by regulations, an independent registered engineer Haas

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

VIA CERTIFIED MAIL

June 11, 1985

Mr. Herman A. Fritschen
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

and

Mr. John S. Grabowski, Jr.
Citgo Petroleum Corporation
P.O. Box 3758
Tulsa, OK 74102

Dear Messrs. Fritschen and Grabowski:

Re: RCRA Closure Record Review
Cities Service Company
Citgo Petroleum Corporation
IND 095267381
Notice of Violation (V-114)

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This letter is to inform you that on July 25, 1984, a record review of Citgo Petroleum Corporation, previously owned and operated by Cities Service Company, located at East Chicago, Indiana, was conducted by Ms. Sheryl Atkins of the Division of Land Pollution Control, Indiana State Board of Health.

Pursuant to the above-referenced record review, it has been determined that Cities Service Company closed the hazardous waste storage portion of their East Chicago facility without an approved hazardous waste closure plan. Since closure, Cities Service Company submitted two (2) letters, one to the U.S. EPA, Region V, and one to the Indiana State Board of Health providing information about closure. The letters

were not adequate to document compliance with the RCRA and 320 IAC 4 closure plan requirements. Company ownership and interim status was transferred to Citgo Petroleum Corporation on May 30, 1983.

The following violation of RCRA and 320 IAC 4 pertaining to the operation of the facility was noted:

1. 40 CFR 265.112(c) and 320 IAC 4-7	Cities Service Company and Citgo Petroleum Corporation failed to submit a RCRA closure plan to the Technical Secretary of the Environmental Management Board at least one hundred eighty (180) days prior to the date of closure of the hazardous storage portion of the East Chicago facility.

Cities Service Company and Citgo Petroleum Corporation, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Submit a detailed approvable closure plan to the State for closure of the hazardous waste storage portion of the facility. The plan must be in conformance with 320 IAC 4-7 (40 CFR 265.110 through 40 CFR 265.115). The plan shall specifically address:

   a. When closure of the hazardous waste storage area occurred at the facility.

   b. How and where the tank, other storage equipment, lines, and removal equipment were decontaminated and disposed of.

Failure to respond adequately to this Notice of Violation and verify a return to compliance at this facility will result in escalated enforcement action.

Please direct your response to this letter and any questions to Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, at AC 317/243-5052.

Very truly yours,

David D. Lamm, Director
Division of Land Pollution Control

RDM/tr
cc: Lake County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Ms. Sheryl Atkins

C.2 Compliance And Enforcement

#398
GES
9/22/82

STATE of INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

SEP 07 1982

Mr. John S. Grabowski, Jr.
Environmental Control and Safety Coordinator
Cities Service Company
Box 300
Tulsa, OK 47102

Dear Mr. Grabowski:

Re: API Separator Waste Disposal
Hazardous Waste Number K052
East Chicago, Indiana

This letter references your meeting with Mr. Steven Wakefield at the Indiana State Board of Health on August 25, 1982, concerning removal of the free liquids from Cities Service Company separator sludge prior to disposal.

As was discussed with Mr. Wakefield, it is permissible to remove the free liquids from the separator sludge if the removal takes place within the separator. Your proposal to build a sloped surface within one of the separators to pile the sludge on for drawing off additional free liquids maintains regulatory compliance with 320 IAC 4. Because the API separator is a wastewater treatment unit as defined in 40 CFR 260.10, your above proposed activities would not fall under 40 CFR Part 265. This exemption from Part 265 can be found in 40 CFR 265.1(c)(10).

Cities Service Company's request of July 22, 1982, for land disposal of the K052 waste is currently being evaluated. As per the telephone conversation between yourself and Ms. Mary Janet Ruzicka of this office on August 2, 1982, Gary Land Development is not an acceptable land disposal site for K052. In your letter of July 22, 1982, the Wheeler Landfill was designated as an alternate site. We are currently basing our review on your choice of Wheeler Landfill as the land disposal facility.

Should you have any questions concerning this matter, please contact Mr. Steven Wakefield of this office at 317/633-0815.

Very truly yours,

Guinn Doyle

Guinn Doyle, Chief
Hazardous Waste Management Branch
Division of Land Pollution Control

SW/tw
cc: Mr. Richard Shandross, U.S. EPA

STATE OF INDIANA

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

INDIANAPOLIS

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

August 25, 1981

Mr. B. L. Reeder, Terminal Manager
Cities Service Company
2500 East Chicago Avenue
East Chicago, IN 46312

Dear Mr. Reeder:

Re: RCRA Generator Compliance Inspection
IND 095267381
Cities Service Company

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste.

This letter is to inform you that on July 14, 1981, an inspection of Cities Service Company located at East Chicago, Indiana, was conducted by Mr. Dave Berrey of the Solid Waste Management Section, Indiana State Board of Health. Your firm was represented by yourself.

Upon arriving at your facility the inspector was informed by yourself that your company had amended its notification of November 17, 1980, to change its status from generator only to generator and storage facility.

It was understood by the inspector that the only waste removed from the site thus far has been nonhazardous and was disposed of at the Wheeler Landfill with approval from our office. All other wastes stored on the site have been sampled and are awaiting analysis at your Company's Tulsa Lab to determine whether or not they are hazardous and therefore subject to RCRA regulation.

Please notify this office if there is any error in the above understanding of the operation at your facility.

A representative of this office will contact you in the future pursuant to your amended status as a storage facility.

A copy of this letter and the inspection report will sent to the U.S. EPA office in Chicago.

If you have any questions, please contact Mr. Dave Berrey at the Indiana State Board of Health, 317/633-0813, or Mr. Richard Shandross, U.S. EPA, 312/886-6146.

Very truly yours,

Guinn Doyle

Guinn Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering
AC 317/633-0178

DBerrey/jb
Enclosure
cc: Mr. Richard Shandross
U.S. EPA

ATE IDENTIFICATION NUMBER
(If Applicable)

IND 095267381
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: CITIES SERVICE COMPANY - Petroleum Products Group

(B) Street: 2500 E. CHICAGO AVENUE

(C) City: EAST CHICAGO (D) State: INDIANA (E) Zip Code: 46312

(F) Phone: 219-398-0734 (G) County:

(H) Date of Inspection: JULY 14, 1981 Time of Inspection (From) 200 (To) 300

(I) Weather Conditions: WARM, CLEAR

(J) Person(s) interviewed	Title	Telephone
B.L. REEDER	TERMINAL MNGR.	219-398-0734

(K) Inspection Participants	Agency/Title	Telephone
DAVE BERREY	ISBH / SANITARIAN	317-633-0813
TERRY GRAY	" "	317-633-0195

(L) Preparer Information

Name	Agency/Title	Telephone
DAVE BERREY	ISBH/SANITARIAN	

* not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Rev. 1-27-81/J.B.

II. BRIEFLY DESCRIBE SITE ACTIVITY

THIS FACILITY IS A REFINING COMPANY IN THE PROCESS OF DISMANTLING. DISMANTLING IS ABOUT ½-¾ COMPLETE. AFTER DISMANTLING THE SITE WILL BE USED AS A STORAGE FACILITY FOR PETROLEUM PRODUCTS. SOME TANKS PRESENTY ON SITE WILL BE CLEANED AND RECONDITIONED FOR THIS USE.

* NOTE: SEE REMARKS AT END OF FORM.

III. MANIFEST REQUIREMENTS
(Subpart B)

		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	✓			MANIFEST WERE AVAILABLE IF NEEDED BUT AS OF YET NO HAZARDOUS WASTE HAS BEEN SHIPPED OFFSITE
(B)	Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				FORM USED: LABEL MASTER
	1. Manifest document number?			✓	"
	2. Name, mailing address, telephone number, and EPA ID number of generator?			✓	"
	3. Name and EPA ID Number of transporter(s)?			✓	"
	4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?			✓	"

*Not Inspected

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?			✓	"
6. The total quantity of waste(s) and the type and number of containers loaded?			✓	"
7. Required certification?			✓	"
8. Required signatures?			✓	"
(C) Does the owner or operator submit exception reports when needed?			✓	"

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)			✓	ALL WASTE STORED IN TANKS AND LAGOONS. WOULD BE SHIPPED OFF-SITE IN TANK TRUCKS,
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)			✓	"
(C) If required, are placards available to transporter?			✓	"
(D) Pre-shipment Accumulation:				"
1. Are containers marked with start of accumulation date?			✓	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?			✓	"

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?			✓	SINCE FACILITY HAD AMENDED NOTIFICATION AS STORAGE FACILITY, SITE WAS NO INSPECTED. WILL BE INSPECTED IN FUTURE BY TSDF INSPECTOR.
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				ANY WASTE IN TANKS GENERATED INCIDENT TO PRODUCTS STORAGE, ALTHOUGH TANKS ARE NOT PRESENTLY BE USED TO STORE PRODUCT.
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?			✓	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?			✓	4
c. Do continuous feed systems have a waste-feed cutoff?			✓	4
d. Are required daily and weekly inspections done?			✓	4
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)			✓	4
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)			✓	4
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?			✓	4

*Not Inspected

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	___	___	✓	FULL INSPECTION NOT
2. Job Descriptions?	___	___	___	DONE AT THIS TIME ~~SINCE~~
3. Description of training?	___	___	___	SINCE NOTIFICATION HAD
4. Records of training?	___	___	___	BEEN AMENDED TO ~~CHANGE~~ CHANGE STATUS TO A STORAGE FACILITY.
5. Have facility personnel received required training by 5-19-81?	___	___	✓	✓
6. Do new personnel receive required training within six months?	___	___	✓	"
B. Prepardness and Prevention (Part 265, Subpart C)				"
1. Maintenance and Operation of Facility:	___	___	✓	
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	___	___	✓	"

*Not Inspected

2. If required, does this facility have the following equipment? ___ ___ ✓ "

   a. Internal communications or alarm systems? ___ ___ ✓ "

   b. Telephone or 2-way Radios at the scene of operations? ___ ___ ✓ "

   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? ___ ___ ✓ "

   Indicate the volume of water and/or foam available for fire control

   _____

   _____

3. Testing and Maintenance of Emergency Equipment:

   a. Has the owner or operator established testing and maintenance procedures for emergency equipment? ___ ___ ✓ "

   b. Is emergency equipment maintained in operable condition? ___ ___ ✓ "

4. Has owner/operator provided immediate access to internal alarms (if needed)? ___ ___ ✓ "

5. Is there adequate aisle space for unobstructed movement? ___ ___ ✓ "

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

*Not Inspected

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)			✓		"
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?			✓		"
c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.			✓		"
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?			✓		"
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.			✓		"

*Not Inspected

2. Are copies of the Contingency Plan available at site and local emergency organizations? — — ✓ — "

3. Emergency Coordinator

   a. Is the facility emergency Coordinator identified? — — ✓ — "

   b. Is coordinator familiar with all aspects of site operation and emergency procedures? — — — — "

   c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? — — ✓ — "

4. Emergency

   If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procdures listed in §265.56? — — ✓ — "

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? ✓ — — LAB ANALYSIS OF WASTE

(B) Has the generator submitted Annual Reports and Exception Reports as required? — — — WHICH HAD BEEN SHIPPED OFF SITE WAS RETAINED. THIS WASTE WAS NON HAZARDOUS.

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste? — ✓ — —

Not Inspected

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

   a. Notified the Administrator in writing? ✓

   b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? ✓

   c. Met the Manifest requirements? ✓

2. Importing Hazardous Waste, has the generator:

   Met the manifest requirements? ✓

VIII. Remarks

REMARKS: UPON ARRIVING AT FACILITY MR REEDER PRESENTED ME WITH AN AMENDED NOTIFICATION SUBMITTED BY JOHN GRABOWSKI OF THEIR TULSA OFFICE CHANGING THEIR STATUS FROM G ONLY TOO G/TSD. SINCE I AM NOT A TSD INSPECTOR I DID NOT MAKE THE COMPLETE INSPECTION, BUT DID DISCUSS THE OPERATION AT THE SITE. SOME TANKS CONTENTS HAD BEEN TESTED AND PROVED TO BE NON-HAZARDOUS (CID LABS) AND WAS SHIPPED TO WHEELER LANDFALL VIA JUSTAK BROTHERS, WITH APPROVAL FROM OUR OFFICE. OTHER TANKS AND LAGOONS WERE AWAITING ANALYSIS OF THEIR CONTENTS AT THEIR TULSA LAB. UNTILL RESULTS ARE OBTAINED THE COMPANY DOES NOT KNOW WHAT KIND OF, OR HOW MUCH, IF ANY HAZARDOUS WASTE THEY HAVE, BUT NOTIFIED AS STORAGE FACILITY SINCE THE FACILITY HAS BEEN SHUT DOWN FOR ABOUT 3 YEARS AND TANKS WERE NOT BEING USED TO STORE PRODUCTS AT PRESENT, AND THEY SUSPECT THAT SOME OF THEM WILL CONTAIN MATERIALS WHICH WILL BE HAZARDOUS, AND NEED TO BE DISPOSED OF WHEN TANKS AND LAGOONS ARE CLEANED.

918-561-4076

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: April 9, 1981

RECEIVED
APR 14 19[illegible]
WASTE MANAGEMENT BRANCH
EPA, REGION V

SUBJECT: ISS Inspection - Cities Service Co.
Petroleum Products Terminal, E. Chicago, IL

FROM: Phyllis A. Reed, Acting Chief
Hazardous Wastes Investigation Section

TO:
Richard Shandross, Chemical Engineer
Waste Management Branch

The enclosed form A General Facility Standards provides information obtained at the subject facility by Everett Mortenson and Erin Moran on March 31, 1981.

Part A info:

SO2 149100 Gal
(633,68 Ton) D001

only process/waste

EPA FORM 1320-6 (REV 3-76)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

___Phone call (Time: am)
(pm)
x Memo

Date: April 24, 1981

To: E.N. Mortenson, Chem Eng, SAD

Subject: ISS Inspection, Cities Service Co., E. Chicago, IN, 3-31-81

From: Richard A. Shandross, Indiana SIO
RS

As we discussed in our phone conversation of April 17, 1981, I have certain questions regarding your inspection report. These questions should be answered before the inspection is considered complete; however I am still forwarding the report to the Enforcement Division for their use.

The questions are:

1. Is the waste hazardous or not? Although the State indicated to you that the waste has a flash point below 200° F, has the company considered the rest of the ignitable definition, or the definition or reactive, corrosive or EP Toxic? While I recognize "common sense", that common sense must be used "in light of the processes and materials used to generate the waste".(262.11(c)(2)). Simple gut feeling of non-hazardousness is insufficient, and there is a reasonable doubt anyway as to the composition and source of the waste. Furthermore, there are 5 listed wastes derived from the source in question (Petroleum Refining, K048-K052).

   The question of sampling (by Cities S.) came up in our conversation. I believe that, while a "representative" sample may be very difficult to obtain, every effort should be made to characterize this large quantity of waste as best as possible. There are many sampling techniques for all kinds of waste. Furthermore, sampling would be necessary to be sure that no PCB's are present, prior to disposal.

2. Why is a waste analyis plan necessary for this facility. I believe that if an inspection is completed, the facility is presumed non-exempt subject to later evaluation, and all deficiencies should be noted.

3. Inspections section is confusing, based on remarks column. It is also incomplete.

4. Were the job titles related to hazardous waste management, as required by 265.16(d)(1)?

5. The section entitled "Use of Manifest System" refers to 40 CFR 265 Sub E, which applies to the handling of manifests accompanying incoming shipments. With that in mind, how should this part of the checklist finally read?

6. Why is the operating record not required at this facility? (See question 2.)

7. (This is a suggestion, not a question) Since you did not review the actual manifest form, checks should have been put in the "NI" column, and info gathered by phone noted in "Remarks".

I also would like to note that the whole of page 21 should have been omitted, as per the instructions at the top of the page. The information duplicates Section J, Tanks. The report as a whole showed good organization, consideration for the report reader in many spots (e.g., "N/A" under Section headings not used), and plenty of explanation of some points. However, it seems as though you may not be consulting the regulations in all sections, but instead relying on the form.

Please call me if you have further questions.

cc: Cho, Meyer, Klepitsch, Skahn, Enforcement Division (with report), Reed

3/7/81

STATE IDENTIFICATION NUMBER
(If Applicable)

IND 095267381
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Cities Service Company

(B) Street: 2500 E. Chicago Ave.

(C) City: E. Chicago (D) State: IN (E) Zip Code: 46312

(F) Phone: 219/398-0734 (G) County: Lake

(H) Operator: Same

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: Same

(P) Street: Box 300

(Q) City: Tulsa (R) State: OK (S) Zip Code: 74102

(T) Phone: 918/561-2211 (U) County: Tulsa

(V) Date of Inspection: 3/31/81 (W) Time of Inspection (From) 10 15 (To) 11 40

(X) Weather Conditions: Clear — 65°F

Note: Environmental Control Manager
for Cities Service Company is;
Mr. John S. Grabowski, Jr.
Tel. 918/561-4076
Tulsa, OK

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Joseph J. Fronczek	Asst. Terminal Mngr.	219/398-0734

(Z) Inspection Participants	Agency/Title	Telephone
E.N. Mortenson	U.S.EPA/Chem. E.	312/886-6221
E. M. Moran	U.S.EPA/Geologist	312/886-6254

(AA) Preparer Information

Name	Agency/Title	Telephone
E.N. Mortenson	See above	See above

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

✓ A. Storage and/or Treatment
   1. Containers (I)
   2. (Tanks (J))
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: The Terminal has API separators through which area run-off is pumped to recover oil derived from any leaks or spills that may occur. This oil is sold to a waste oil recycler.

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	N/A			
2. Facility expansion?	N/A			
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			The Tank contents,* bottom settlings and water (BS&W) have been analyzed so waste management co. at Wheeler, IN will accept for final disposal in their landfill.
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	N/A			When the existing 149,000 gals. of BS&W has been disposed there will be no more. The current Terminal operations do not generate hazardous wastes
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	N/A			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓			
2. Artificial or natural barrier around facility?	✓			
3. Controlled entry?	✓			
4. Danger sign(s) at entrance?	✓			No Smoking Signs
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓			Repair orders
2. Records of operator error?		✓		Only 9 employees in all
3. Records of discharges?		✓		

*Not Inspected

* In a Call To Mr. Steven Wakefield, ISBH, (317/633-0178), he advised That Cities Service has been given permission To dispose, as a one 3 Time operation, To Wheeler, IN landfills up To 225,000 gals. of opaque waste water and oil sludge at rate of 20,000 gals. per day. According To Mr. Wakefield This oil sludge has a flash point of 200°F and is not classified as hazardous waste.

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	We keep watch daily of all features of the Terminal
5. Safety, emergency equipment?	✓	---	---	Have Scott Air packs
6. Security devices?	---	---	---	---
7. Operating and structural devices?	---	---	---	---
8. Inspection log?	---	---	---	---
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	All employees are classified as product inspectors
2. Job descriptions?	✓	---	---	---
3. Description of training?	---	✓	---	---
4. Records of training?	---	✓	---	---
5. Have facility personnel received required training by 5-19-81?	✓	---	---	District Safety inspector comes in to check the Terminal 3 or 4 Times per year
6. Do new personnel receive required training within six months?	✓	---	---	Have monthly Safety meetings
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	---
2. No smoking signs?	✓	---	---	---
3. Separation and protection from ignition sources?	✓	---	---	---

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			All Trucks have radios
2. Telephone or 2-way radios at the scene of operations?	✓			Plant Telephones Thru-out. Terminal manager and Assistant carry beepers
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			Have a 200 gal. foam Trailer. Have Ansul powder. All 9 Terminal employees have been to Ansul Training School

Indicate the volume of water and/or foam available for fire control:

_____

_____

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? ✓ ___ ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	___	✓	___	Do have SPCC plan
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓	___	___	E. Chicago Fire Dept. comes in yearly for Check of all parts of Terminal. This Takes them 3 days
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓	___	___	In SPCC Plan book
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓	___	___	_____
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	✓			At local emergency groups. They are updated as necessary
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			Terminal Manager Mr. B.L. Reeder
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	N/A			

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				Have correct manifests and will use when the 149,000 gals. of Hazardous waste hauled to Wheeler, IN
2. Are records of past shipments retained for 3 years?	✓			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?			✓	The plan is to haul out the hazardous waste to Wheeler, IN in Vacuum Trucks with 3200 gal. Cap. Some material may be so thick that it will have to be shoveled out. They expect the job can be done in 11 working days

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? N/A

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I? N/A

c. The location and quantity of each hazardous waste within the facility? ✓

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? N/A

f. Reports detailing all incidents that required implementation of the Contingency Plan? N/A

g. All closure and post closure costs as applicable? (Effective 5-19-81) N/A

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	N/A	___	___	_____
2. Has this plan been submitted to the Regional Administrator	"	___	___	_____
3. Has closure begun?	"	___	___	_____
4. Is closure estimate available by May 19, 1981?	"	___	___	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	___	___	___	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: N/A Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	___	___	___	_____
2. Are containers compatible with waste in them?	___	___	___	_____
3. Are containers stored closed?	___	___	___	_____
4. Are containers managed to prevent leaks?	___	___	___	_____
5. Are containers inspected weekly for leaks and defects?	___	___	___	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	___	___	___	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	N/A			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	N/A			

J
TANKS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	N/A			All Three Tanks are covered
3. Do continuous feed systems have a waste-feed cutoff?	N/A			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	N/A			When existing 149,000 gals of hazardous waste hauled out There will be no more
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			Tanks are grounded and have covers
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	N/A			

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 210,000 gallons (The 149,000 gals. of bottom settlings & water is distributed in each of three 5000 barrel capacity covered tanks

Tank diameter: 37 feet x Height = 27 ft.

Distance of tanks from property line 100 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: N/A Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	---	---	---	---
2. Do earthen dikes have protective covers?	---	---	---	---
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	---	---	---	---
4. Is the freeboard level inspected at least daily?	---	---	---	---
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	---	---	---	---
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	---

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	✓	Mr. Fronczek could not locate. We talked to Mr. Reeder on 4/2/81. He has a batch of style SF-50 Manifest forms as supplied by Labelmaster
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	___	___	This confirmed in Call To Mr. Reeder
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	___	___	ditto

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			Confirmed by Mr. Reeder
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			
(C) Does the owner or operator submit exception reports when needed?	N/A			No shipments made to date. Expect to move all hazardous wastes out to Wheeler, IN starting the latter part of April 1981.
2. PRE-TRANSPORT REQUIREMENTS				
(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)			✓	Waste will be hauled by Justak Bros. & Company Inc. 1701 129th Whiting, IN a licensed Hazardous Waste hauler. (Tel. 219/659-7500)
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)			✓	Will go out in licensed Tank Trucks
(C) If required, are placards available to transporters of hazardous waste?			✓	Presume Justak does placard per regs

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	N/A			
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?				
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?				
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	✓			
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	N/A			Tanks are covered
c. Do continuous feed systems have a waste-feed cutoff?	N/A			
d. Are required daily and weekly inspections done?	✓			
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	✓			Tanks are grounded
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	N/A			

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	N/A			Removal to be a one time operation in April and May of 1981
(B) Has the generator submitted Annual Reports and Exception Reports as required?	N/A			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

N/A

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

As a large petroleum products terminal There was no observable activity. Material moves in and out Through underground pipelines. The Terminal does not have a Truck loading system.

All storage Tanks are well diked and areas are well maintained.

Remnants of The old refinery still remain.

Piles of asbestos which The contractor had piled up in The past have been disposed of.

Since the waste as covered in The notification and Part A permit application is now classified by The State of Indiana as not hazardous, flash point 200 °F, This situation can not be considered serious. The Terminal manager asserts, once The accumulated bottom Settlings and water are disposed of That will end The matter, There will be no more BS&W generated. That on hand derived from refinery operations a decade ago.

D.Corrective Action

Determination: Follow Up- Soil Sampling?

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: CITGO Petroleum (E. Chicago)_____

EPA ID: IND 095 267 381_____ City: East Chicago_____ State: IN____

Name of Reviewer: Maureen McHugh_____ Date of Review: 7/14/08_____

1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: ___3___ SWMUs and ____2__ AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: _____ SQG, ___X_ LQG, or _____ Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA?
			If Yes, was the closure: _____ CC, or _____ CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

_____ No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

__X__ Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Site Summary

No record of closure approved by IDEM at SWMU2

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

75 cubic yards of asbestos-contaminated soil removed in 1984
In 1985, oil-saturated soil was manifested and transported as asphalt-saturated soil and disposed of in a landfill off-site per permit from IDEM

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

AOC1- Vegetation appeared to be dead and soil appeared spongy and often black

If you answered 'No' to item #9, briefly explain your justification for disagreeing with the conclusions and recommendations from the report.

Soil sampling at SWMU2, AOC1 to ensure oil contamination was removed, AOC2 to ensure asbestos contamination was removed. High risk to GW from oil contamination, moderate risk to GW from asbestos. GW flows into Lake Michigan.

SEP 09 1991

5HR-12

Thomas Linson, Branch Chief
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste
Management Branch
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Re: CITGO
East Chicago, Indiana
Preliminary Assessment/
Visual Site Investigation
IND 095 267 381

Dear Mr. Linson:

The United States Environmental Protection Agency (U.S. EPA) has received some information from PRC Environmental Management, Inc. (PRC) concerning CITGO of 2500 E. Chicago Avenue, East Chicago, Indiana and the possible need for an investigation at the subject facility. PRC is a contractor for U.S. EPA.

During a recent Preliminary Assessment/Visual Site Inspection conducted by PRC at the subject hazardous waste management facility, representatives from the facility were questioned about a surface impoundment across the street from the facility's location. According to the facility's representatives, the mentioned property had been sold to Lake Materials in 1975. As observed by the PRC representatives, this impoundment appears to be "active", with liquid waste and sludges, and the unit is only partially fenced. The PRC representatives also witnessed the dumping of landscape waste at this impoundment by a load truck. Photographs of the unit are available from PRC.

If you have any questions, please contact Bill Miner of PRC at (312) 856-8700 or Mirtha Capiro of my staff at (312) 886-7567.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

bcc: Louis M. Halkias, 5CCI

| OFFICIAL FILE COPY | 9/6/91

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
9/3/91	MC 9/4/91	9/5/91	9/9/91

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CITGO PETROLEUM CORPORATION
EAST CHICAGO, INDIANA
IND 095 267 381

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	IND 095 267 381
Date Prepared	:	December 2, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IN05
Prepared by	:	PRC Environmental Management, Inc. (Laurel Berman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the CITGO Petroleum Corporation (CITGO) facility in East Chicago, Indiana. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

CITGO serves as a terminal for oil and fuel products used in various industries. Oil and fuel products are piped into 58 storage tanks from seven pipelines that originate on the Gulf Coast. CITGO has operated at its current location since its creation in 1983. The site has been used as a terminal and refinery since 1929, under the name Cities Service Company. CITGO occupies 300 acres and currently employs 11 people. The facility operates as a large-quantity generator and storer of hazardous waste when the tanks containing oil and fuel products and the skimming tank in the oil-water separator are cleaned. Cleaning occurs infrequently (greater than 90 days). Closure activities were conducted on the former tank 195 but the PA/VSI revealed no evidence of EPA or Indiana Department of Environmental Management (IDEM) approval.

The PA/VSI identified the following 3 SWMUs, and 2 AOCs at the facility:

Solid Waste Management Units

1. Oil-Water Separator
2. Former Tank No. 195
3. Tank No. 88

Areas of Concern

1. Former oil-saturated soil area
2. Former asbestos-contaminated soil area

There is a high potential for the release of hazardous constituents to ground water from surface soils contaminated with oil and asbestos. In the early 1980s, CITGO removed approximately 1,700 cubic yards of oil-saturated soil and 75 cubic yards of asbestos-contaminated soil from the facility grounds. From 1974 to 1976, the oil-saturated soil and asbestos-contaminated soil were generated from dismantling a former operational refinery. CITGO removed the oil-saturated soil until the surrounding soil was visibly clean. The asbestos-

contaminated soil was sampled after its removal, but CITGO's records do not indicate whether or not further action was required or if the site was considered effectively clean. In addition, it is possible that oily waste stored in former tank No. 195 may have affected surrounding surface soils during the dismantling of this tank. Also, oil-water separator waste could leak into surrounding surface soils when CITGO employees transfer this waste into tank No. 88.

Ground water is not used as drinking water in the East Chicago, Indiana, area. However, ground water flows to area surface waters, including the Grand Calumet River and Lake Michigan.

The potential for release of hazardous constituents to surface water is low. Water in the facility's oil-water separator originates from storm water runoff. The separator consists of a series of separate chambers used to separate oily residue from runoff, leaving "clean" water. The clean water is discharged to the Grand Calumet River, approximately 1,200 feet from the facility. The discharge pipe from the facility is so close to the river that river water enters the discharge pipe and mixes with clean water in the discharge bay of the separator. The oil-water separator operates under a National Pollution Discharge Elimination System (NPDES) permit. Under permit requirements, CITGO routinely monitors final effluent for pollutants at the point of discharge.

The potential for a release of hazardous constituents to the air is low at the facility. Tanks containing oil and fuel products are closed and sealed with primary or secondary vapor seals to prevent air emissions.

Receptors at the facility include CITGO employees and nearby residents of East Chicago. A fence surrounding the facility limits access by potential receptors.

The areas where asbestos-contaminated soil and oil-saturated soil were removed should be sampled to make sure that no pollutants remain in the soil. Soil around Tank No. 88 and the former tank 195 should also be sampled to make sure there are no pollutants in the soil. Ground water in these areas may need to be monitored if contamination is discovered, as the depth to it is only 3 to 6 feet.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm operational, SWMU, AOC, and release information obtained during the PA.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the CITGO facility in East Chicago, Indiana (IND 095 267 381). The PA was completed on July 8, 1991. PRC gathered and reviewed information from the Indiana Department of Environmental Management (IDEM) in Indianapolis, Indiana, and from EPA Region 5 RCRA files. The VSI was conducted on July 10, 1991. It included interviews with CITGO facility representatives and a walk-through inspection of the facility. PRC identified 3 SWMUs, and 2 AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 19 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The CITGO facility is located at 2500 East Chicago Avenue in the city of East Chicago, Lake County, Indiana (41° 38' 33" latitude north; 87° 28' 19" longitude west). Surrounding cities include Whiting, Indiana, to the northwest, Hammond, Indiana, to the west, Highland, Indiana to the south, and Gary, Indiana to the east. Lake Michigan is about 1-1/2 miles north of CITGO.

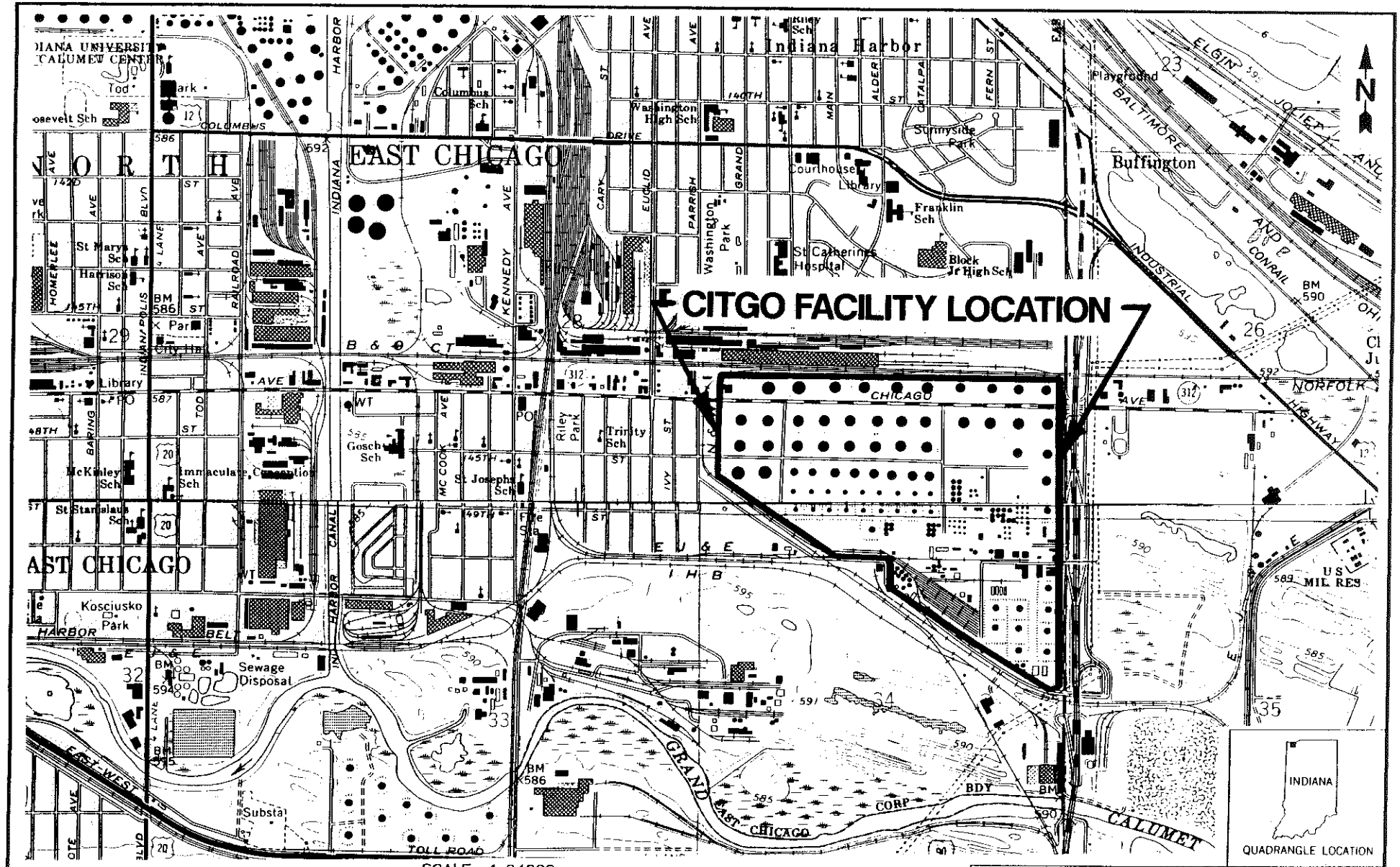
CITGO occupies 300 acres. The facility is surrounded by a security fence. On its east side, it is bounded by Cline Avenue, the boundary between Gary and East Chicago. Gary Avenue and the Elgin Joliet and Eastern Railway border the facility to the south. Parish Avenue borders the facility to the west. Chicago Avenue provides access and bisects the northern portion of the facility, with facility storage tanks on either side of the road. A small access road near the oil-water separator is blocked by a locked gate. The access road leads to a frontage road that runs along Cline Avenue and provides access to the nearby Indiana Toll Road. Figure 1 shows the facility location.

The land surrounding the facility is mainly industrial. The nearest residential areas are about 1-1/2 miles north of the facility, with a population of approximately 3,000, and 1-1/2 miles to the east, with a population of approximately 1,500. The Gary Municipal Airport is about 1 mile east of the facility.

2.2 FACILITY OPERATIONS

Figure 2 shows the facility layout, including tanks, SWMU and AOC locations, and areas where a total of 1700 cubic yards of oil-saturated soil was removed. CITGO has operated at its current location since 1983, and employs 11 people. CITGO operates three shifts per day, 7 days a week. The facility consists of 58 tanks, an office, a truck rack, and an oil-water separator. The SWMUs at CITGO are listed in Table 1. Tank capacities were provided by CITGO and are detailed in Table 2.

CITGO serves as a terminal for oil and fuel products used in various industries. Oil and fuel products are piped into 58 storage tanks from seven pipelines that originate on the Gulf Coast. The storage tanks are steel, with fiberglass bottoms; oil products are distributed to industries in Indiana, Michigan, Illinois, and Wisconsin.



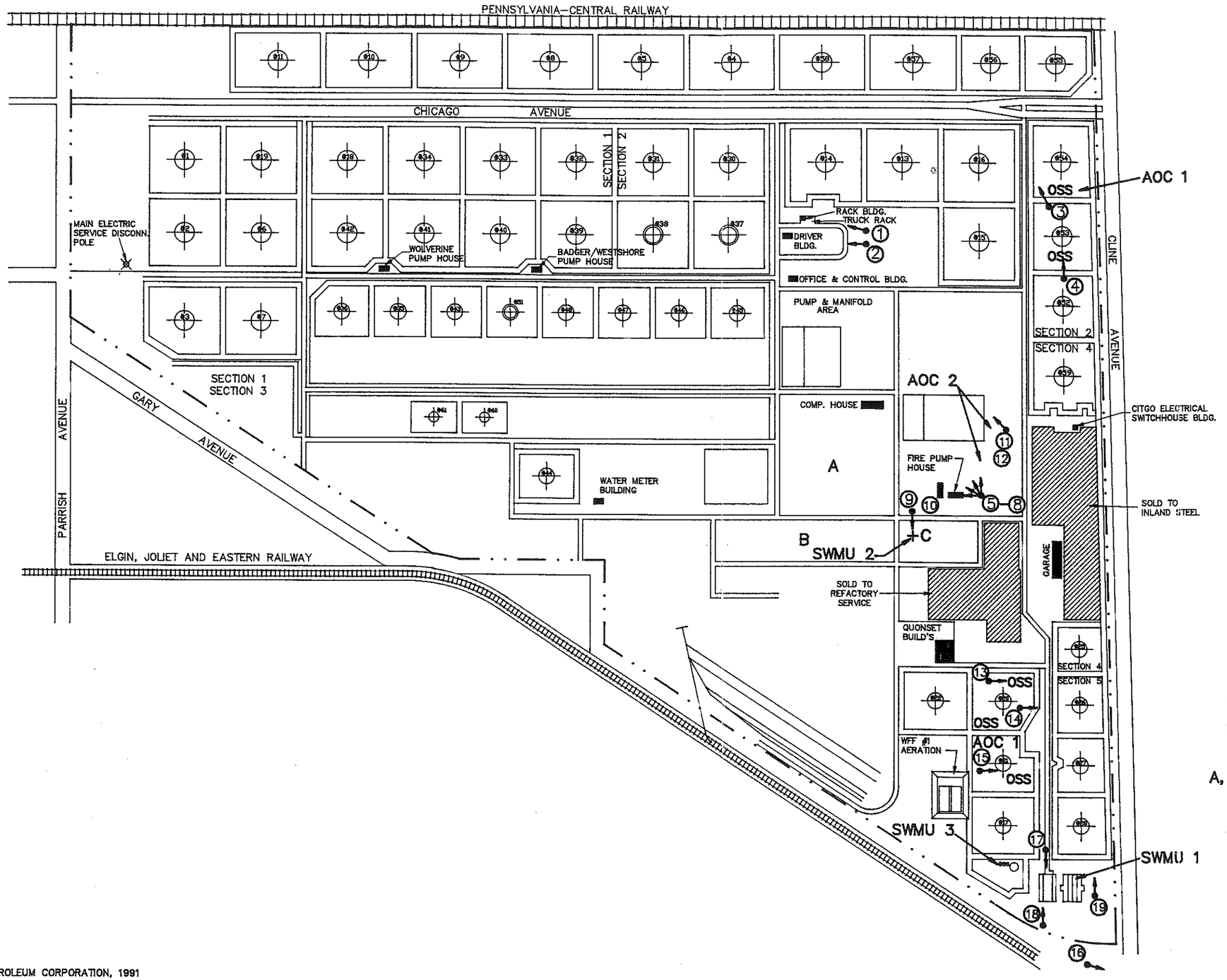
SOURCE: U.S.G.S., Photorevised, 1986.

CITGO PETROLEUM CORPORATION
EAST CHICAGO, INDIANA

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.



SOURCE: CITGO PETROLEUM CORPORATION, 1991
DRAWN: 2/19/90

CITGOLAY.DWG – 11/25/91 – CFR

CITGO PETROLEUM CORPORATION
EAST CHICAGO, INDIANA

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Oil-Water Separator	No[1]	Active
2	Former Tank No. 195	Yes	Closed, tank removed from the facility. Closure not approved by EPA or IDEM
3	Tank No. 88	Yes	Active

Notes:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

1 The oil-water separator is regulated under the National Pollution Discharge Elimination System (NPDES). Waste is manifested under RCRA only when the unit is cleaned.

TABLE 2

TANK CAPACITIES
(1000 gallons)

Tank No.	Volume	Tank No.	Volume
1	140	40	55
2	140	41	55
3	140	42	55
4	140	43	55
5	140	44	55
6	120	45	55
7	120	46	55
8	140	47	55
9	140	48	55
		49	55
10	140		
11	140	50	37.5
13	80	51	55
14	80	52	80
15	80	53	80
16	80	54	80
17	80	55	135
18	80	56	80
19	80	57	120
		58	127.5
20	55	59	80
21	55		
22	55	60	15
25	55	61	15
26	55	88	10
27	55		
28	55		
30	55		
31	55		
32	55		
33	55		
34	55		
35	55		
36	55		
37	55		
38	55		
39	55		

The tanks are bordered by soil berms, which serve as secondary containment. None of the tanks are open at the top. The tanks were built from 1929 to 1954.

The truck rack was built by CITGO in 1985. It is used to load jet fuel for the airline industry. The truck rack is permitted by the City of East Chicago for loading of low-grade fuel distillates under permit No. 616. The truck loading rack is also permitted by the State of Indiana under the general permit for the facility, No. 45-11-93-0592 (CITGO, 1991c). Stormwater runoff from the truck rack is routed by an underground pipe to the oil-water separator.

The oil-water separator is used to treat stormwater runoff. All stormwater is routed into the "dirty" side of the unit. Oily residue is separated from the runoff through a series of tanks or bays. When the "dirty" side of the unit is full, CITGO employees pump the water over a weir to the "clean side." Clean water flows by gravity to the outlet bay of the separator, for eventual discharge to the Grand Calumet River. The oil-water separator is regulated under a NPDES permit.

The CITGO site was used as a petroleum refinery from 1929 through 1972. The Texas-Empire Pipe Line Company, which subsequently became Cities Service Company (Cities), began operations at the site in 1929 (City of East Chicago, 1929). On December 31, 1972, Cities closed the refinery operations. From 1974 through 1976, Cities dismantled the refinery; the site has since operated only as a petroleum products terminal facility. The area of the former refinery operations is shown in Figure 2.

In March 1983, Cities created CITGO the refining, marketing, and transportation operations. In September 1983, Cities sold CITGO to The Southland Corporation, which in turn sold half of CITGO operations to Petroleos de Venezuela, South America (PDVSA). In 1990, the other half of CITGO was sold to PDVSA. CITGO operates as an independent business entity of PDVSA.

2.3 WASTE GENERATING PROCESSES

The are five waste streams that have been generated at this facility. Four waste streams are currently generated and one waste stream was formerly generated. Wastes currently generated consist of 1) low-grade fuel distillate tank bottoms, 2) gasoline tank bottoms, 3) oil and waste water, and 4) oily residue. Oil-water emulsion waste from tank bottoms was generated until about late 1980 and was stored in tank 195 (SWMU 2).

TABLE 3
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Low-Grade Fuel Distillates Tank Bottoms/D001	Tank Bottoms	Removed Directly[1]
Gasoline Tank Bottoms/D001	Tank Bottoms	Removed Directly
Oil and Wastewater/D001	Tank Bottoms	Removed Directly
Oily Residue/D001	Oil-Water Separator	SWMU 1, 3
Oil-water Emulsion Waste/ D001, D008	Tank Bottoms	Formerly SWMU 2 (Waste no longer generated)

Notes:

* Primary management unit refers to a SWMU that currently manages the waste.

1 Wastes that are removed directly are not managed on site.

The first waste stream consists of low-grade fuel distillates (D001) from distillate tanks. CITGO currently employs Pollution Control Industries of America (PCIA) of East Chicago, Indiana, to clean distillate tanks. These tanks are cleaned at least once every one to five years. CITGO first drains the product out of the tank and stores it in an unused tank, then a PCIA crew scrubs and vacuums out the inside of the tank. Waste low-grade fuel distillate (D001) is vacuum-pumped directly into a hauler truck. PCIA takes the distillate waste to a cement kiln, where it is burned as fuel.

The second waste stream consists of gasoline tank bottoms. If tank bottoms contain gasoline waste (D001), a PCIA crew vacuums out the tank bottoms and drums the waste. These tanks are cleaned about once every one to five years. PCIA transports this waste to various facilities in other states, where it is either landfilled or used as fuel.

The third waste stream consists of wastewater and oil that accumulates in tank bottoms. This waste is classified as an ignitable waste (D001) because of its low flash point (< 140°F). CITGO employees drain the wastewater from the tanks and dispose of it directly into hauler trucks from Clean Harbors in Chicago, Illinois. Clean Harbors analyzes samples of the wastewater before accepting it for disposal to ensure that the Water Reclamation District of Greater Chicago (WRDGC) standards for wastewater quality are met. Clean Harbors then discharges the water to the WRDGC sanitary sewer system. Clean Harbors forwards wastewater analysis results to CITGO.

All of the above activity takes place in one day. Thus none of these wastes are accumulated on site.

The fourth waste stream consists of oily residue (D001) from the oil-water separator. Stormwater from CITGO property is routed through the oil-water separator (SWMU 1). Any oily residues that collect in the separator are skimmed from the surface by CITGO personnel, who pump the residue into tank No. 88 (SWMU 3), which serves as a holding tank. This tank is cleaned when it is full enough to transfer the waste to drums (about once every five years). CITGO contracts PCIA to drain the tank and drum and then immediately transport the ignitable contents. PCIA transports this waste to various facilities in other states, where it is either landfilled or used as fuel.

The fifth waste stream which is no longer generated was an oil-water emulsion waste (D001, D008) from tank bottoms. This material was stored in tank 195 (SWMU 2) prior to off-site disposal. Generation of this waste ceased in the later part of 1980.

2.4 RELEASE HISTORY

This section contains a discussion of the history of releases to surface water, sediment, soil, ground water, and air at the CITGO facility.

In 1980, EPA investigated the site where asbestos insulation had been piled during the dismantling of the refinery. The EPA contracted Clayton Environmental Consultants to sample and analyze soil from these areas. The analysis found asbestos contamination (CITGO, 1991c). In July 1983, CITGO contracted National Wrecking Company (National Wrecking) of Chicago, Illinois to remove asbestos waste from the idle refinery site under an Indiana Environmental Management Board (IEMB) permit. The permit specified disposal procedures (IEMB, 1983).

In January 1984, CITGO applied for an extension of the IEMB permit to allow removal of 75 cubic yards of asbestos-contaminated soil (CITGO, 1984a). According to the Ken Robb, CITGO's terminal manager, National Wrecking conducted the removal and transport of the asbestos-contaminated soil. The soil was disposed of in the Indiana Waste Systems, Inc., landfill in Wheeler, Indiana (CITGO, 1991c).

In September 1981, Cities applied for a permit from the Indiana State Board of Health (ISBH) to dispose of 1700 cubic yards of oil-saturated soil. The wastes ranged in composition from 9 to 24% water and from 76 to 91% oil and water sludge. Prior to this time, the material was sampled, and no hazardous materials were present. The material yielded flash point values of 210°F, 435°F, and (no flash point). Cities requested a permit to dispose of the waste in the Indiana Waste Systems, Inc., landfill, located in Wheeler, Indiana (Cities, 1981a).

According to CITGO personnel, ISBH denied the permit request. Subsequently, a permit dated April 19, 1985, was issued by IDEM. The permit number was No. 850335, and it expired April 17, 1990. The permit authorized Chemical Waste Management, Inc. (CWM) to remove the oil-saturated soil, manifest it, and transport it as asphalt-saturated soil, a nonhazardous waste. The oil-saturated soil was dug up and disposed of in the CID landfill operated by Waste Management, Inc., in Calumet City, Illinois (CITGO, 1991c).

2.5 REGULATORY HISTORY

CITGO operates as a large-quantity generator and storer of hazardous waste when the tanks containing oil and fuel products and the skimming tank in the oil-water separator are cleaned. Cleaning occurs infrequently (greater than 90 days). Although the unit identified on the facility's part A (SWMU 2) was closed, hazardous waste is currently stored longer than 90 days in tank 88 (SWMU 3).

RCRA

Cities submitted a Notification of Hazardous Waste Activity Form as a generator of hazardous waste on August 18, 1980 (Cities, 1980a). This notification listed Cities' waste as ignitable and toxic. Subsequent manifests coded the waste as D001 and D008 (lead).

On November 19, 1980, Cities submitted another Notification of Hazardous Waste Activity Form, amending its original notification to indicate that the facility was storing waste for greater than 90 days. When the original notification was submitted, Cities planned to have already closed tank No. 195, which contained 149,000 gallons of oil and water emulsion waste (D001, D008). By November 19, 1980, the tank had not been closed, and Cities applied for interim status as a storage facility by submitting a Part A Permit Application for the storage of waste contained in this tank (Cities, 1980b).

In March 1981, EPA inspectors conducted a RCRA compliance inspection of Cities as a generator of hazardous waste. No major violations were discovered in the inspection. In May 1981, after reviewing the inspection report, EPA determined that Cities would no longer operate as a TSD facility (EPA, 1981b). On March 18, 1983, CITGO took over operations of the facility. CITGO submitted a Notification of Hazardous Waste Activity Form on November 28, 1983, as a generator of hazardous waste (CITGO, 1983).

In November 1981, Cities initiated closure of tank No. 195. In June 1982, Cities sent a detailed history of tank No. 195 and its removal to EPA Region 5, stating that tank No. 195 was no longer needed to store hazardous waste (Cities, 1982). Subsequently, CITGO submitted a letter to EPA Region 5 requesting closure of the tank and indicated that the facility would remain a generator of hazardous waste (CITGO, 1985).

In April 1985, ISBH performed a closure inspection of the area where tank No. 195 had been placed. The ISBH inspector found no remaining signs of the tank, as well as no signs of soil

stains (ISBH, 1985). The ISBH inspector requested that CITGO submit a new closure plan to ISBH.

In June 1985, ISBH issued a Notice of Violation to Cities citing the alleged closure of tank No. 195 and disposal of waste from the tank. Although the facility was CITGO at the time, Cities was still in existence as a company and responded by letter to ISBH detailing how the tank closure was performed. The closure steps included disposal of the waste material from tank No. 195. Cities contracted CWM of Alsip, Illinois, to remove the waste, drum it, and dispose of it. CWM completed this work in January 1982. Cities retained Haas and Associates of Michigan City, Indiana, to inspect the empty tank. In the summer of 1983, Cities hired National Wrecking to dismantle and remove the tank and its appurtenances as scrap metal. National Wrecking sold the scrap metal to Scrap Corporation of America in Chicago, Illinois. Cities included manifests and contracts detailing the tank closure. Cities also included the closure plan, with applicable references to federal regulations for closure (Cities, 1985). The PA/VSI revealed no evidence that EPA or ISBH approved the closure activities for tank No. 195.

CERCLA

At present, no CERCLA operations are identified under CITGO's identification number. Prior to 1980, Cities used a surface impoundment, located across Cline Avenue in Gary, Indiana, for sludge disposal from its oil-water separator. Cities submitted a CERCLA notification for this site in June 1981 (Cities, 1981b). The impoundment has not been used by CITGO since the mid-1970s. The site (IND 980 607 469) is no longer owned by CITGO (EPA, 1981a). The surface impoundment is not addressed in this report since it was located at a different facility and is not in the scope of this PA/VSI.

Air Permits

Both the City of East Chicago and the State of Indiana require permits for CITGO's air emissions from the storage tanks. All the tanks containing gasoline have internal floating roofs with a primary seal; some have a secondary seal as well. Distillate tanks have conical roofs to help control air emissions. East Chicago issued a permit for each of the 58 tanks; IDEM issued one permit for all of the tanks. The truck loading rack is also permitted by East Chicago for possible air emissions. Each year, CITGO calculates its emissions to air as part of the East Chicago permit requirements.

NPDES Permit

A NPDES permit (No. IN 0000 159) allows CITGO to discharge water from the oil-water separator into the Grand Calumet River at the approximate rate of 1,000 gallons per day. Under the NPDES permit requirements, CITGO samples the effluent on a monthly basis and reports the results in discharge monitoring reports to the Indiana Department of Environmental Management (IDEM, 1989).

Legal Actions

In November 1983, EPA initiated a Consent Decree, filed January 30, 1984, ordering Lloyd J. Hodges Company and Cities to clean up the asbestos-contaminated soil (U.S. District Court, 1984). In January 1984, before the decree was filed, CITGO had already applied for an extension of the permit to allow removal of 75 cubic yards of asbestos-contaminated soil (CITGO, 1984a). According to Ken Robb, CITGO's terminal manager, National Wrecking conducted the removal and transported the asbestos-contaminated soil. The soil was disposed of in the Indiana Waste Systems, Inc., landfill in Wheeler, Indiana (CITGO, 1991c). On April 4, 1984, the U.S. District Court, Northern District of Indiana, terminated the Consent Decree and dismissed the case (U.S. District Court, 1984).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the CITGO facility.

2.6.1 Climate

The climate in Lake County is temperate. The average daily temperature is 48.3°F. The average daily temperature in January is 32.4°F. The average daily temperature in July is 73.6°F (City of East Chicago, 1991b).

The prevailing wind is from the north, off of Lake Michigan (U.S. Department of Agriculture, 1972). Average wind speed is highest in January at 12.4 miles per hour and lowest in June at 9.3 miles per hour (City of East Chicago, 1991b).

Annual net precipitation for the county is 33.86 inches (City of East Chicago, 1991b). The maximum 1-year, 24-hour rainfall was 5.64 inches (U.S. Department of Agriculture, 1972). Snowfall ranged from 3.0 to 27.6 inches per year during the period from 1934 to 1963. The

maximum 24-hour snowfalls were 12 inches in 1939 and 11 inches in 1956 (U.S. Department of Agriculture, 1972).

2.6.2 Flood Plain and Surface Water

The CITGO facility is not located in a flood-prone area. It occupies a zone that has minimal, if any, flooding (City of East Chicago, 1991a).

The chief water bodies in Lake County are the Grand Calumet River, Lake Michigan, and Wolf Lake, a large recreational lake. Surface water in the area is used for recreational purposes. The County obtains its drinking water from Lake Michigan.

The pathway from the facility to surface water originates with the Grand Calumet River, which drains into the Indiana Harbor Shipping Canal, which in turn drains into Lake Michigan (City of East Chicago, 1991b).

All surface runoff on the CITGO facility is routed to the oil-water separator. After oily residues are skimmed, "clean" water is pumped to the "clean side" of the oil-water separator, where it then flows by gravity through discharge pipes into the Grand Calumet River.

2.6.3 Geology and Soils

Consolidated bedrock, consisting of sandstones, carbonates, and shale, can be found at approximately 90 feet below ground surface. The most recent stage of glaciation, the Wisconsonan, deposited approximately 60 feet of clay till on the surface of the bedrock. The clay sequence is overlain by unconsolidated silty sand deposits (Burns and McDonnell, 1991).

2.6.4 Ground Water

East Chicago's ground-water monitoring program includes 11 monitoring wells that are typically 6 feet deep. The wells are constructed of 3-foot-diameter concrete pipe. The primary contaminants of concern reflect the dominant refinery, terminal, and steel mill operations throughout Lake County and include polychlorinated biphenyls, sulfur, iron, and heavy metals.

East Chicago has monitoring wells in several locations. A map of these wells shows that the depth to the ground-water table varies from 3 to 6 feet (City of East Chicago, 1991b). East Chicago does not have on record any information about hydraulic conductivities or the ground-water flow rate. The ground water flows either into Lake Michigan or the Grand Calumet River.

City of East Chicago personnel have been unable to pinpoint exact flow patterns of ground water in Lake County (City of East Chicago, 1991b).

City of East Chicago personnel claimed that the ground water in the area near the CITGO facility is too contaminated with oil and fuel products and pollutants from area steel mills to be usable for drinking water purposes (City of East Chicago, 1991b).

2.7 RECEPTORS

The CITGO facility occupies 300 acres in the City of East Chicago, Indiana. East Chicago is 11.2 square miles in area, with a population of 33,892. There are 11 public schools and four private schools in the city (City of East Chicago, 1991c). Receptors near the CITGO facility include the Gary Municipal Airport and two residential areas, all within 1-1/2 miles of the facility. One residential area is east of the facility and has a population of 1,500; the other residential area, north of the facility, houses 3,000 people.

CITGO is surrounded by a security fence. The main access road is Chicago Avenue. A small access road is located near the oil-water separator and leads onto the access road adjacent to Cline Avenue. This road is blocked by a locked gate. The facility operates 7 days a week, three shifts per day with 11 employees total.

Surface water from Lake Michigan, located about 1/2 mile from CITGO, supplies East Chicago with its municipal drinking water. The intake from the East Chicago Filtration Plant extends 1-1/2 miles north into Lake Michigan. The Filtration Plant is about 1-1/2 miles from CITGO (City of East Chicago, 1991c). Lake Michigan is also used for recreational activities such as boating and fishing. Residents of East Chicago do not use private wells for drinking water because of a history of ground-water contamination from local refineries and area steel mills (City of East Chicago, 1991b).

A release from the CITGO facility could pose potential harm to nearby residents. All surface and ground water ultimately flows into Lake Michigan. A release could affect water life as well as surrounding vegetation. The ground water is already heavily saturated with contaminants resulting from years of oil and fuel waste disposal and spills, along with pollutants from area steel mills (City of East Chicago, 1991b).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 3 SWMUs identified during the PA/VSI. The following information is presented for the SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1	**Oil-Water Separator**
Unit Description:	The oil-water separator is used for separating oil and fuel residues from stormwater runoff. The unit consists of one tank with a "clean" side consisting of three bays and a "dirty side" with two bays. Oil is skimmed from the dirty side by CITGO employees and placed in a tank where it is held for permanent removal. Water flows over a weir from the dirty side to the clean side. Water is discharged by gravity from the clean side to the Grand Calumet River (see photographs Nos. 17, 18, and 19).
Date of Startup:	This unit has been in operation since 1929. In 1976, after the refinery was dismantled, the oil-water separator was used only for treating stormwater. In 1982, Cities added a leachate collection system to one chamber of the oil-water separator.
Date of Closure:	The unit is currently active.
Wastes Managed:	This unit manages an ignitable waste (D001) from the collection of oily residue.
Release Controls:	No release controls are built into the oil-water separator; however, the bays are concrete and only in the case of a flood should any releases or spill-overs occur.
History of Release:	No releases from this unit have been documented.
Observations:	The unit appears to be in sound condition. PRC observed no evidence of leaks or cracks surrounding the unit.

SWMU 2	**Former Tank No. 195**
Unit Description:	The former tank No. 195 is the unit that was identified on the Part A Permit Application submitted by Cities in 1980. The tank was used to store oil-water emulsion waste from tank bottoms (D001, D008). The tank had stored a maximum of 149,000 gallons and was made of steel. It was located in the southeast portion of the facility (see photographs Nos. 9 and 10).
Date of Startup:	The startup date for this unit is unknown.
Date of Closure:	This unit is inactive. CITGO did not provide an official closure date, although cleaning, and inspection procedures were completed January 12, 1982. The PA/VSI revealed no evidence that EPA or IDEM approved the closure.
Wastes Managed:	This unit managed an ignitable waste, toxic waste (D001, D008) from the collection of oily residue.
Release Controls:	The former tank No. 195 had no known release controls.
History of Release:	No releases from this unit have been documented.
Observations:	This tank no longer exists.

SWMU 3	**Tank No. 88**
Unit Description:	This 10,000 gallon concrete and steel tank is used for greater than 90-day storage of oily residue (D001) from the oil-water separator. The tank is located in the southeast corner of the facility (tank No. 88 is visible in the left-hand portion of photograph No. 17). When tank No. 88 becomes full enough to warrant removal of the oily residue, CITGO operates as a generator of hazardous waste. CITGO contracts with a removal company, currently PCIA, to vacuum out the contents of the holding tank. PCIA removes, drums, manifests, and disposes of the oily, ignitable waste (D001). PCIA typically sells the waste to other facilities for use as a low-

	grade fuel or disposes of the waste in an appropriate landfill (CITGO, 1991b).
Date of Startup:	The startup date for this unit is unknown.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages an ignitable waste (D001) from the collection of oily residue.
Release Controls:	This unit has an earthen base and is bordered by a soil berm.
History of Release:	No releases from this unit have been documented, and none were noted during the VSI.
Observations:	No cracks or leaks in or from this tank were visible at the time of the inspection.

4.0 AREAS OF CONCERN

PRC identified 2 AOCs during the PA/VSI. These AOCs are discussed below.

AOC 1 Former Oil-Saturated Soil Area

In May 1984, CITGO requested a permit from IEMB to dispose of 1700 cubic yards of oil-saturated soil. CITGO reported that it had analyzed the waste in accordance with EPA Extraction Procedure (EP) toxicity testing and found it to be nontoxic (CITGO, 1984b). In August 1983, CITGO analyzed samples of the oil-saturated soil in the company's in-house laboratory. The analysis showed the following results in parts per million (CITGO, 1984c):

Parameter	Concentration
Lead	1.70
Arsenic	0.02
Barium	2.65
Cadmium	< 0.01
Chromium	0.90
Silver	< 0.01
Selenium	< 0.01
Mercury	0.02

The oil-saturated soil was removed by CWM in 1985. The waste was manifested and shipped by CWM as a nonhazardous, asphalt-saturated soil. The waste was transported by South Chicago Disposal and disposed of in the CID landfill in Calumet City, Illinois. According to CITGO employees, the soil was removed until the areas were visibly clean. PRC inspectors noted that vegetation in the area appeared to be brown, or dead. In addition, most of the soil throughout the facility was "spongy" and often appeared black, as if it contained oily residue (see photographs Nos. 3, 4, 13, 14, and 15). CITGO does not have records indicating whether or not additional soil testing was conducted after the removal. Because test results for the remaining soil are not available, the areas where oil-saturated soil was removed should be tested to ensure that the soil is free of any remaining contamination.

AOC 2 **Former Asbestos-Contaminated Soil Area**

In July 1983, CITGO contracted the removal of 75 cubic yards of asbestos-contaminated soil from the idle refinery site. An IEMB permit for the removal specified disposal procedures (IEMB, 1983). CITGO contracted with the Lloyd L. Hodges Company to conduct the removal. PRC inspectors did not notice unusual disturbances throughout the former refinery area. PRC photographed an overview of the former refinery area (see photographs Nos. 5, 6, 7, 8, 11, and 12).

On November 8, 1983, a Consent Decree initiated by EPA ordered Cities to clean up asbestos-contaminated soil. The Consent Decree was filed January 30, 1984. In January 1984, CITGO applied for an extension of the ISBH permit to allow removal of 75 cubic yards of asbestos-contaminated soil (CITGO, 1984a). According to the Ken Robb, the CITGO terminal manager, National Wrecking of Chicago, Illinois, conducted the removal and transport of the asbestos-contaminated soil. The soil was disposed of in the Wheeler landfill in Wheeler, Indiana (CITGO, 1991c). The Consent Decree was subsequently dismissed by the U.S. District Court on April 4, 1984.

Although the Consent Decree was dismissed, CITGO was unable to supply documents to PRC indicating that the asbestos-contaminated soil was completely removed and that detailed sampling was conducted. Because no follow-up sampling results are available, the areas where the asbestos-contaminated soil was removed should be tested to assure the soil is free of any remaining contamination.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 3 SWMUs and 2 AOCs at the CITGO facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 4 identifies the SWMUs and AOCs at the CITGO facility and suggested further actions.

SWMU 1 **Oil-Water Separator**

Conclusions: The oil-water separator is an enclosed, concrete and steel structure constructed below ground level. PRC observed no evidence of cracks or leaks from this unit. The probability of a release to environmental media is low. The potential for release via environmental media is summarized below.

Ground Water: Low. The oil-water separator is constructed of concrete bays or tanks enclosed by earth. The depth of each bay is about 6 feet. Although the distance to the water table is only 3 to 6 feet in this area, oily residues are not likely to leak into the ground water. Unless the foundation of one of the bays on the "dirty" side of the separator becomes severely cracked, the likelihood of a release is minimal.

Surface Water: Low. The oil-water separator discharges clean water by gravity flow to the Grand Calumet River under an NPDES permit. The river is located about 1,200 feet from the point of discharge. The discharge pipe is so close to the river that river water travels up the discharge pipe and mixes with water in the discharge bay of the separator. Because the unit is constructed so that the "dirty" and "clean" sides are separated by concrete and steel, the chance of a release to surface water is minimal.

Air: Low. The oily residue that collects in the oil-water separator originates from stormwater runoff. The waste is ignitable, but was not very aromatic at the time of inspection.

On-Site Soils: Low. The oil-water separator is an independent unit. Soils are separated from the unit by its concrete and steel structure. Releases could possibly occur if oily residues spilled during removal from the skimming tank.

Recommendations: No further action is suggested at this time.

TABLE 4
SWMU AND AOC SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Oil-Water Separator	1929 to present	None	No further action is suggested.
2.	Former Tank No. 195	Unknown	None	Sample soil at former tank location.
3.	Tank No. 88	Unknown	None	Sample soil around the tank.

	AOC	Operational Dates	Evidence of Release	Suggested Further Action
1.	Areas of origin for oil-saturated soil	N/A	Former release, possibly still contaminating area	Sample the area surrounding former saturated soil spots
2.	Areas of origin for asbestos-contaminated soil	N/A	Former release, possibly still contaminating area	Sample the area surrounding former saturated soil spots

SWMU 2 **Former Tank No. 195**

Conclusions: This former tank was a steel structure. This tank no longer exists. The probability of a current release to environmental media is non-existent as the tank had been closed and then inspected by a professional engineer. There is a low probability that a past release could have affected ground water and surface soils. However, ground water in the area is not used for human consumption. There is no documented history of release.

Recommendations: PRC recommends soil sampling in the former location of the tank since there is no record of closure approved by IDEM.

SWMU 3 **Tank No. 88**

Conclusions: This tank is a concrete and steel structure and appeared to be in good condition at the time of the VSI. There is no history of release from the tank. It rests on an earthen base and is surrounded by a soil berm. The distance to the water table is only 3 to 6 feet in this area. If a spill were to occur there is a high probability for on site soil and ground water to be affected. However, the tank's structural integrity minimizes the potential for a release to occur. thus the overall release potential to all environmental media (ground water, surface water, air and on-site soils is low.

Recommendations: PRC recommends soil sampling around the tank.

AOC 1 **Former Oil-Saturated Soil Area**

Conclusions: Oil-saturated soil was removed from areas surrounding existing fuel and oil product storage tanks (see Figure 2). If all of the oil-saturated soil was removed, no potential for release would exist, but because the oil-saturated soil was removed only until visibly clean, the potential for a release to the remaining soil exists. The potential for release to environmental media if oil-saturated soil remains is summarized below.

Ground Water: High. If soil contaminated with oil residue remains in the former oil-saturated soil spots, ground water could be affected, because the depth to the water table is only 3 to 6 feet in this area.

Surface Water: Low. Oily residues remaining in the soil should tend to adhere to soil particles, prohibiting a large release to groundwater flowing to surface water. Rainfall runoff is routed to the oil-water separator, preventing a chance for oil-saturated runoff to enter surface water prior to separation.

Air: Low. Oil-saturated soil spots were cleaned up several years ago. If any residue remains in the surrounding soil, it is probably a very minimal amount. This should not cause a large release to the air.

On-Site Soils: High. The oil-saturated soil was removed only until the areas were visibly clean. If any oily residue remains in the surrounding soil areas, it would constitute a direct release to on-site soils. CITGO was unable to provide records of soil sampling to verify adequate clean up in this area.

Recommendations: The facility should sample the soil areas formerly contaminated by oil products to ensure that these areas are no longer contaminated.

AOC 2 **Former Asbestos-Contaminated Soil Area**

Conclusions: Asbestos-contaminated soil areas resulted from dismantling the refinery (see Figure 2). CITGO was unable to provide documents that detailed further action, such as results of follow-up sampling performed after the asbestos-contaminated soil was removed. Without sampling results indicating a thorough cleanup, the possibility of a release to the remaining soil is fairly high. The potential for release to environmental media is summarized below.

Ground Water: Moderate. If soil contaminated with asbestos remains, ground water could be affected, because the depth to the water table is only 3 to 6 feet in this area.

Surface Water: Low. Any asbestos fibers remaining in the soil could wash off the soil during storms. However, rainfall runoff is routed to the oil-water separator, and asbestos fibers should be collected in the oil that is separated.

Air: Low. The asbestos-contaminated soil was removed several years ago using ISBH approved methods. If any residue remains in the surrounding soil, it is probably a very minimal amount and should not cause a large release to the air.

On-Site Soils: High. The asbestos-contaminated soil was removed, but no follow-up sampling results were available to show that removal was complete. If any asbestos remains in the surrounding soil areas, it would constitute a direct release to on-site soils.

Recommendations: The facility should sample the soil areas formerly contaminated by asbestos to ensure that these areas are no longer contaminated.

REFERENCES

Burns and McDonnell, Engineers, Architects, Consultants, 1991. Refinery Area Ground-Water Investigation Report, Prepared for Amoco Oil Company Refinery, Whiting, Indiana, Project 5W-2781, Kansas City, Missouri, June 1991.

CITGO Petroleum Corporation (CITGO), 1983. Notification of Hazardous Waste Activity Form, November 28.

CITGO, 1984a. Letter from CITGO to Indiana Environmental Management Board (IEMB), Regarding Extension of Permit for Asbestos Disposal, January 17.

CITGO, 1984b. Letter from CITGO to IEMB, Requesting Waste Disposal Permit for Oil-Saturated Soil, May 11.

CITGO, 1984c. Letter from CITGO to Indiana State Board of Health (ISBH), Regarding Analytical Results of Oil-Saturated Soil Analysis, November 16.

CITGO, 1985. Letter from CITGO to U.S. Environmental Protection Agency (EPA), Regarding Closure of Tank No. 195, September 24.

CITGO, 1991c. Telephone Conversation Between Laurel Berman, PRC Environmental Management, Inc. (PRC), and Ken Robb, Terminal Manager, CITGO, August 19.

Cities Service Company (Cities), 1980a. Notification of Hazardous Waste Activity Form, August 18.

Cities, 1980b. Letter from Cities to EPA Regarding Amended Hazardous Waste Activity Form, November 19.

Cities, 1981a. Letter from Cites to ISBH Requesting Permit to Dispose of Oil-Saturated Soil, September 8.

Cities, 1981b. Notification of Hazardous Waste Site, June 12.

Cities, 1982. Letter from Cities to EPA, Regarding Dismantling and Inspection of Storage Tank No. 195, June 24.

Cities, 1985. Letter from Cities to ISBH, Regarding Notice of Violation for Tank No. 195 and Disposal of Waste from the Tank, July 17.

City of East Chicago, 1929. Purchase Agreement Between City of East Chicago and Texas Empire Pipeline Company, September 24.

City of East Chicago, 1991a. Flood Insurance Map. Provided by Rich Sobilo, Assistant City Engineer, City of East Chicago, July 10.

City of East Chicago, 1991b. Interview with Rich Sobilo, Assistant City Engineer, City of East Chicago, July 10.

City of East Chicago, 1991c. Telephone Conversation Between Laurel Berman, PRC, and Rich Sobilo, Assistant City Engineer, City of East Chicago, August 22.

U.S. Environmental Protection Agency (EPA), 1981a. Notification of Hazardous Waste Site, Regarding a Closed Surface Impoundment Site Formerly Owned by Cities and Sold in 1975, June 9.

EPA, 1981b. Internal memo to Indiana Waste Management Branch, Clarifying that Cities was no longer a Treatment, Storage, or Disposal Facility, May 19.

Indiana Environmental Management Board, 1983. Permit Issued to Indiana Waste Systems, Inc., Regarding Disposal of Asbestos Waste in their Landfill in Wheeler, Indiana, July 6.

Indiana Department of Environmental Management, 1989. NPDES Permit, April 25, 1989.

Indiana State Board of Health, 1985. Office Memorandum, Regarding Closure Inspection of Tank No. 195, May 22.

U.S. Department of Agriculture, 1972. Soil Survey of Lake County Indiana, July.

U.S. Department of Housing and Urban Development, 1980. Flood Insurance Rate Map, City of East Chicago, Indiana.

U.S. District Court, 1984. Termination of Consent Decree, April 4.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

June 25, 1991

REPLY TO ATTENTION OF:
5HR-12

Mr. Ken Robb
Terminal Manager
CITGO Petroleum Corporation
2500 East Chicago Avenue
East Chicago, IN 46312

Re: Visual Site Inspection
CITGO Petroleum Corp.
IND 095 267 381

Dear Mr. Robb:

The United States Environmental Protection Agency (U.S. EPA) Region 5 will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The VSI of your facility is to verify the location of all solid waste management units (SWMU) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for July 10, 1991 at 8:30 A.M. The inspection team will consist of Mary Wojciechowski and Laurel Berman of PRC Environmental Management, Inc., contractors for the U.S. EPA. A third PRC inspector may accompany them. Representatives of the Indiana Department of Environmental Management may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Sheri L. Blanchin

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Tom Linson, IDEM - Indianapolis
Al Gallegos, CITGO - Tulsa

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	IND 095267381

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
CITGO Petroleum Corporation	2500 East Chicago Avenue				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
East Chicago	IN	46312	Lake		

09 COORDINATES: LATITUDE	LONGITUDE
4° 38′ 33"	87° 28′ 19"

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Indiana Tool Road (I-90), exit Cline Avenue South, east on Chicago Avenue

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Petroleos de Venezuela, S.A. (PDVSA)	c/o CITGO Petroleum Corporation, Box 3758		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Tulsa	OK	74102	(918) 499-5111
07 OPERATOR *(If known and different from owner)*	**08 STREET *(Business, mailing, residential)***		
Same			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
			( )

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 11 / 18 / 1980 (MONTH DAY YEAR) ☒ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: 6 / 9 / 81* (MONTH DAY YEAR) ☐ C. NONE

*Submitted by Cities (CITGO), but sold prior to 1980 (1975). Site has a different I.D. No. than CITGO

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 7 /10 /91
☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1929 (BEGINNING YEAR) Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The substances present include oil and fuel products.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility has a history of asbestos-contamination of 75 cubic yards of soil and oil-saturation of 1,700 cubic yards of soil, both originating from dismantling the former refinery several years ago.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

U.S. Environmental Protection Agency, Indiana Department of Environmental Management, and CITGO Petroleum Corporation.

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA, Region 5			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Laurel Berman		PRC EMI	(312) 856-8700	8 / 23 /91 (MONTH DAY YEAR)

EPA FORM 2070-12(7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	IND 095267381

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☒ G. GAS

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

TON NA*
CUBIC YARDS NA
NO. OF DRUMS NA
* Not measurable at time of inspection

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☒ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	NA*	Gallons	Skimmed from oil-water separator and held in tank
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
OLW	Oily residue (D001)				

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Note: Oil and fuel residues, and wastewater are cleaned from tank bottoms on an as-needed basis.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	IND 095267361

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

A history of ground-water contamination dating back to the 1920s exists from refineries and steel mills in the area.

01 ☒ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 34,000 — 04 NARRATIVE DESCRIPTION

Population of East Chicago and CITGO employees could be affected by a spill. Lake Michigan is within 1 mile of the facility.

No surface water contamination has been documented.

01 ☒ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ~4,500 — 04 NARRATIVE DESCRIPTION

No air contamination documented.

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 11 — 04 NARRATIVE DESCRIPTION

CITGO employees. Note: PRC inspectors observed a crew welding a tank seam with an open torch.

01 ☒ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 11 — 04 NARRATIVE DESCRIPTION

CITGO employees.

01 ☒ F. CONTAMINATION OF SOIL — 02 ☒ OBSERVED (DATE: after 1976) — ☐ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: 300 *(Acres)* — 04 NARRATIVE DESCRIPTION

Approximately 1,700 cubic yards of soil was saturated with oil. An additional 75 cubic yards were contaminated with asbestos.

01 ☒ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 34,000 — 04 NARRATIVE DESCRIPTION

None documented. However, contamination of drinking water could affect all of East Chicago, which uses Lake Michigan for drinking water.

01 ☒ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: 11 — 04 NARRATIVE DESCRIPTION

Overall safety of the facility was good. Potential for exposure to vapors exists for tank workers. Open-torch welding, mentioned above, poses potential for injury.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None documented.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	IND 095267381

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA — 02 ☒ OBSERVED (DATE: 1976 & 1991) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Former soil contamination occurred in 1976.

PRC inspectors noted that vegetation and grass surrounding tanks was brown and apparently dead.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None documented.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None documented.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented.

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

CITGO discharges stormwater to the Grand Calumet River. The discharge is permitted and monitored under an NPDES permit.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented. However, former CERCLA surface impoundment across Cline Avenue from the facility poses question of illegal dumping by CITGO or other nearby facilities.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: approximately 34,000

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5 files, IDEM files, City of East Chicago files, site inspection.

CITGO Petroleum Corporation
2500 East Chicago Avenue
East Chicago, Indiana 46312
IND 095 267 381

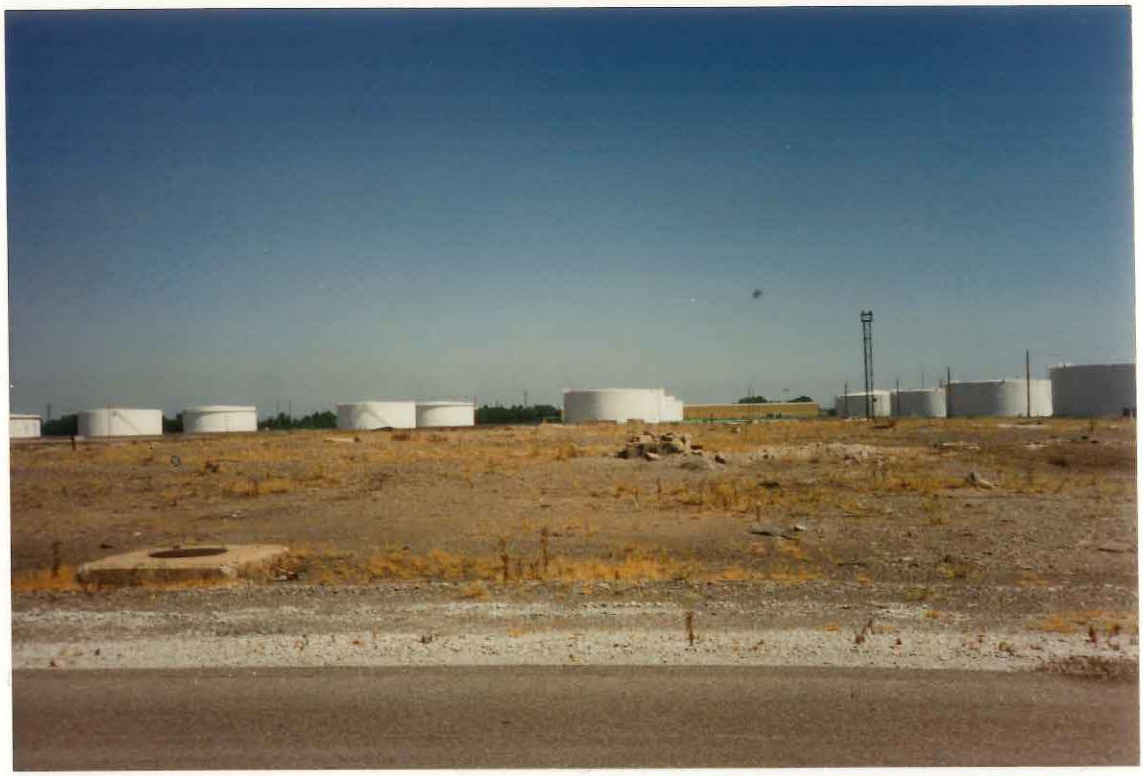
Date:	July 10, 1991
Facility Representatives:	Ken Robb, Terminal Manager Dana Burch, Senior Counsel
Inspection Team:	Mary Wojciechowski, PRC Environmental Management, Inc. Laurel Berman, PRC Environmental Management, Inc.
Photographer:	Mary Wojciechowski
Weather Conditions:	Sunny, warm, clear, temperature about 70°F
Summary of Activities:	The VSI began at 8:30 a.m. with an introductory meeting. The inspection team started the meeting with a discussion of the purpose of the VSI and the agenda for the visit. Mr. Robb continued with a discussion of CITGO's current operations. Ms. Burch joined the meeting briefly to provide a history of operations at the facility. Mr. Robb also discussed solid wastes generated because the Consent and the past release history. Most of the information was exchanged on a question-and-answer basis. Mr. Robb provided the inspection team with copies of documents requested. At 10:30 AM, Mr. Robb led the inspection team on a tour of the facility, including solid waste management areas, and possible areas of concern. CITGO has no production capability at the East Chicago site, which limited the tour to the outdoor areas of the site. The inspection team took photographs of all relevant site areas, such as AOCs, SWMUs, and overall facility layout. The tour concluded at 11:15 AM, after which the inspection team held a brief exit meeting with Mr. Robb. The VSI ended at 11:30 AM.

Photograph No. 1 Location: Northeast corner of the facility
Orientation: Northwest Date: July 10, 1991
Description: 15 drums of de-icer stored alongside truck loading rack.

Photograph No. 2 Location: Northeast corner of the facility
Orientation: Northwest Date: July 10, 1991
Description: Truck loading rack.

Photograph No. 3 Location: AOC 1
Orientation: North Date: July 10, 1991
Description: One of the former oil-saturated soil areas, west of tank No. 54.

Photograph No. 4 Location: AOC 1
Orientation: North Date: July 10, 1991
Description: One of the former oil-saturated soil areas, south of tank No. 53.



Photograph No. 5
Orientation: Northwest
Description: Overview of former refinery foundation.

Location: Eastern portion of the facility
Date: July 10, 1991

Photograph No. 6
Orientation: Northwest
Description: Overview of former refinery foundation.

Location: Eastern portion of the facility
Date: July 10, 1991

Photograph No. 7
Orientation: West
Description: Overview of former refinery foundation.

Location: Eastern portion of the facility
Date: July 10, 1991

Photograph No. 8
Orientation: West
Description: Overview of former refinery foundation.

Location: Eastern portion of the facility
Date: July 10, 1991

Photograph No. 9
Orientation: South
Description: Former tank No. 195 site.

Location: Eastern portion of the facility
Date: July 10, 1991

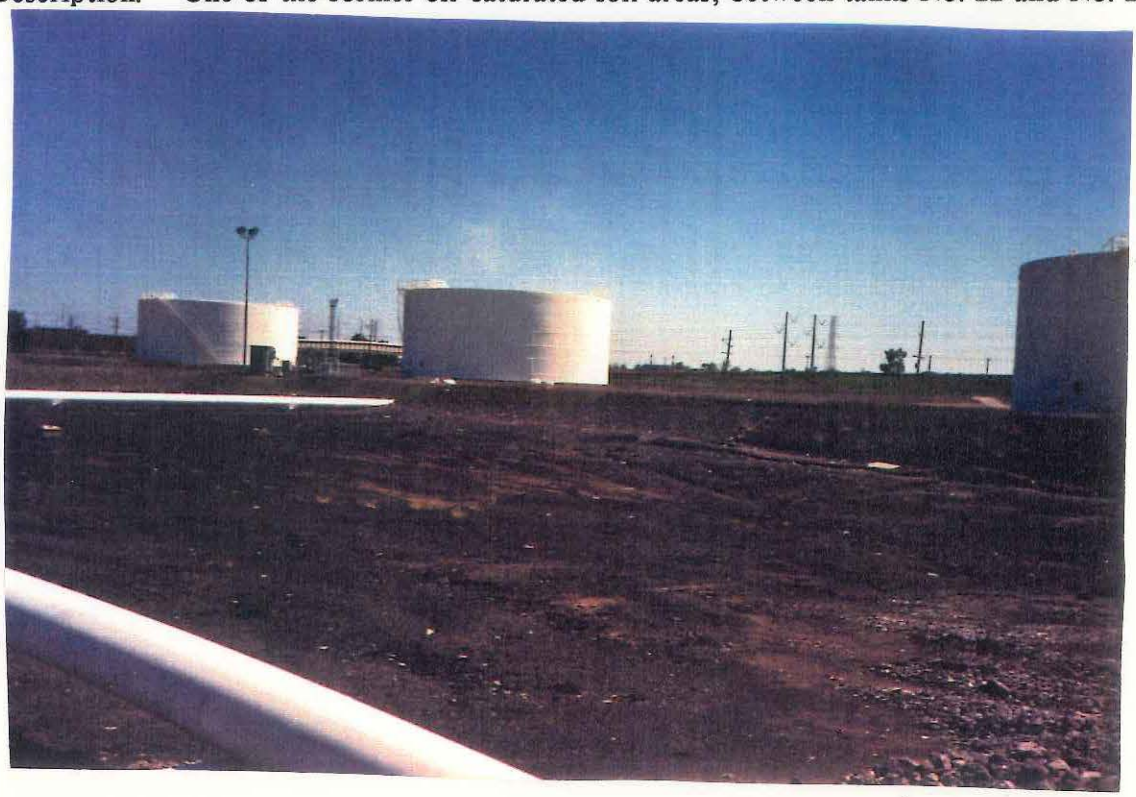
Photograph No. 10
Orientation: South
Description: Former tank No. 195 site.

Location: Eastern portion of the facility
Date: July 10, 1991

Photograph No. 11 — Location: Eastern portion of the facility
Orientation: Northwest — Date: July 10, 1991
Description: Overview of refinery foundation.

Photograph No. 12 — Location: Eastern portion of the facility
Orientation: Northwest — Date: July 10, 1991
Description: Overview of tank storage area and former refinery foundation in foreground.

Photograph No. 13 Location: AOC 1
Orientation: East Date: July 10, 1991
Description: One of the former oil-saturated soil areas, between tanks No. 22 and No. 20.



Photograph No. 14 Location: AOC 1
Orientation: East Date: July 10, 1991
Description: One of the former oil-saturated soil areas, east of tank No. 20.

Photograph No. 15 Location: AOC 1
Orientation: East Date: July 10, 1991
Description: One of the former oil-saturated soil areas, southeast of tank No. 21.

Photograph No. 16 Location: Southeast corner of the facility
Orientation: Southeast Date: July 10, 1991
Description: Discharge outlet for oil-water separator.

Photograph No. 17 Location: SWMU 1
Orientation: South Date: July 10, 1991
Description: Overview of final effluent bays of oil-water separator

Photograph No. 18 Location: SWMU 1
Orientation: North Date: July 10, 1991
Description: Inlet bays of oil-water separator.

Photograph No. 19
Orientation: North
Description: Inlet valves of oil-water separator.

Location: SWMU 1
Date: July 10, 1991

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

7/10/91 SUNNY, WARM ~ 70°F, CLEAR
8:30 AM - 10:30 AM

CITGO
KEN ROBB, P.E.

- Disassembled refinery (1 mile) in 1981 - became VCKA

1/22/82 Haas (Patrick) inspected closed tank

1986 - Formal closure plan submitted

1983: Cities sold to Nat'l Wrecking

Cities Service owned & operated refinery from 1929 - 1972. (1976) (refinery dismantled). Dec 31, 1972, closed refinery. In 1975-76, dismantled refinery

1972-1983: Cities Service

~ 1982: Bought by Occidental Petrol.

OWNER: CITGO PETROLEUM CORPORATION
which is a subsidiary of Venezuella Gov't
for ~ 5 yrs (1985) (PDVSA)

DANA BURCH, ATTY TO CITGO, (Senior Counsel)
FROM TULSA, OK

March 18, 1983 - Citgo Petroleum Corp.
created by Cities Service Co.
- transferred refining, marketing,
& transp. aspect (dis operations)
- CITGO was subsidiary of Cities
- Done because Occidental Petroleum
Corp (from L.A.) was going
to buy cities, & only wanted
Production aspect
→ Occidental closed deal w/
Cities

Occidental
/
Cities
Citgo

(3)

Sept 1, 1983: Cities sold CITGO
to the Southland Corp.

~~Sept~~ 1982: Southland sold
1/2 of CITGO operations
to PDVSA

1990: Other 1/2 sold to PDVSA
Now is wholly owned by
PDVSA (Petroleos de Venezuela, S.A.)
- CITGO operates as a sep.
entity w/in PDVSA.

FACILITY MAP: Shows former refinery
area / tank that was disassemblable
(we drew in)

11 EMPLOYEES
300 ACRES

FACILITY OPERATION:

- 7 PIPELINES (from Gulf coast)
FURNISH: IN, MI, WI, IL
- ROUTED INTO DIFF. TANKS (55) DEPENDING ON PRODUCT
(55 storage tanks)

- TANKS ARE STEEL, most w/fiberglass bottoms
(we have diagram of tanks w/capacity in barrels. 1 barrel = 42 gals)
- II° containment of is soil berms
- No open top tanks
- Tanks built from 1929 - 1954

- Operating as CITGO since March 18, 1983

- Became terminal facility 1976
(1972 - 1976 — do, not active - dismantling, nothing else)

WASTES GENERATED

- No process waste

- Every few years (≈ 5 yrs), operate as RCRA generator of HW (high F.P. from gas) (D001)
When clean bottoms of tanks

- Currently use Pollution Control Industries of East Chicago to clean distillate tanks & CITGO drains product out, then a crew scrubs the inside of the tank & then vacuumed out by PCIA

- PCIA takes distillate waste to a (cement) kiln - use as low-grade fuel
If it's gasoline waste - is drummed & taken by someone else

- PCIA also takes gas tank waste
- PCIA vacuums out & transports to various disposal facilities in other states

- Some water accumulates in tank bottoms, CITGO drains & Clean Harbor takes → Then to WRDGE ~~CITGO~~ Clean Harbor meets WRDGE stds.

CLEAN HARBOR', 312/646-6200
Jim Banacki, Sales Mgr.

- Clean Harbor sends results to CITGO

1991 MANIFESTS ~~LOW GRADE FUEL (DISTILLATES)~~

3/27/91	- 3000 gal	Low grade fuel
5/28	- 1300	
4/3	- 3000	
5/6/91	- 2500 + 25 drums fuel oil (gas bottoms)	
4/25 -	1550 Non haz - wash water - cleaning filters	

1990 MANIFESTS

7/6	- 1500 gal	low grade fuel	
8/2	- 3000	9/4 - 2500	4/18 - 1500
4/31	- 2500	7/3 - 3000	
		6/29 - 3000	

RCRA:

3 WASTE STREAMS:

(1) Low Grade fuel (Distillates)
(2) Gasoline Products
(3) Waste from tank bottoms

MANIFESTS - LO

1991 LOW GRADE FUEL

3/27	3000 gals
5/28	1300
4/3	3000
5/6	2500

1991 OTHER WASTE

5/6	25 drums - rust/gas bottoms
4/25	1550 gals - wash water
5/13	300 - fuel

1990 LOW GRADE FUEL

7/6	1300 gals	7/3	3000
8/2	3000	6/29	3000
8/31	2500	4/18	1500
9/4	2500		

1c : 120 000 gal of H_2O discharged through clean Harbor

OIL/WATER SEPERATOR (API seperator)

- Pumps stormwater out
- NPDES permit - but only handles SW b/c no process now
- Inactive - no process water
- Got copy of permit: Discharge to Cal. River

- Some sludge from skimming tank near oil/water separator. Any oil/fuel residues that collect in seperator after a heavy rain are put in skimming tank. This tank is cleaned when others are cleaned

SWMU'S

- only 1: oil/water seperator

& AOC's

PAST SWMU'S (POSSIBLE SWMU'S):

PAST AOC

1981: 8,140 barrels of oil - saturated dirt
- CITGO dug out & hauled off (until visibly gone)
- no sampling done
- The 8140 barrels were from several areas (see map) 055 → oil sat'd soil

REG HISTORY

- RCRA
- CERCLA
- NPDES
- AIR PERMIT - 2 permits
  1. City of East Chgo
  2. State of IN. Air control emissions for storage tanks
- Gas tanks: Internal floating roofs for control - Have I° & / or II° seals →

- New tanks have both I & II vapor tanks

Distillate tanks : Cone roofs

- EA/yr GRU calculates loss to air as part of permit

- Truck loading rack : no gasolines
  - has permit w/ City of E. Chgo.

- City Permit : Permit for ea/tank (58)
- State : 1 permit - lists all tanks

TO VIEW :

(1) oil/H_2O seperator
(2) Old location of #195 tank & Refinery
(3) Former contam. dirt spots
(4) Truck rack
(5) Discharge pipes - S/W from seperator

IDEM INSPECTIONS :

- AIR & WATER INSPS.
- ≈ 1 X / YEAR (SPORADIC)

CITY INSPS :

1 or 2 X/YEAR

- Ali Kahn > Health Dept Bldg. on Indianapolis Blvd s/o Fire Dept (near Amoco)

HISTORY :

Surface Impoundment - API sludge
- sold off (across street) ~ 1975

- Lake Materials owns property now (owned by Hoosier State Bank)
- Soil area

GROUNDS INSPECTION 10:30 AM – 11:10 AM

(1) TRUCK RACK
1985 - main use: Jet fuel for airlines
- Runoff to oil/H_2O sep. (underground pipe)
- 15 drums de-icer use w/ fuel
PHOTO (1) & (2)

(2) OILY/DIRT SITES
PHOTO (3) - BY TANK #54
(4) - BTWN #52 & 53

(3) OVERVIEW OF REFINERY AREA 5-6
- Torn down
- Foundation / rubble
(NOTE, All stress dead in area some get/fuel [illegible])
(4) Former tank # 195
~~(5) Former "~~
~~(6) old refinery find~~
~~(7) Tank storage~~
(6) Close up of tank #195

(4) OLD TANK # 195
PHOTO (9) Former tank site
9-12 (10) " " "
(11) old refinery finds (
~~9-13~~ (12) tank storage (same named = for tank/piping (old))
~~(13) close up of tank 195~~

(5) OILY DIRT SITES
(SW puddles clear - no oil sheen) PHOTO (13) (edge) Dirt spots
(14) by tank #20
(15) By tank # 21
(- Dirt is very dark, asphalt-like to begin with)

(6) OIL / WATER SEPERATOR
PHOTO (16) Discharge PIPES (concrete box)
(17) Final effluent
~~(18) Final effluent close up (open tower)~~
~~(19) Dirty oil lines~~ Inlet for oil/water
(20) Inlet valves

- Inlet valves allow 0.1 l/Hz.

Into sep

- Settles by gravity
- When full, skim "dirty side" to "clean side" — 3 bays
- Takes samples of clean H_2O to CITOW
- ~~Pumps~~ Flows by gravity to 1st outlet

Layout:

NOTE: CITOW wants copies of photos